

# TSD File Inventory Index

Date: August 14, 2001

Initial: CM

Facility Name: <u>Palmer, Jr. (Or. Federal Site)</u>			
Facility Identification Number: <u>DHD 004-200 044</u>			
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>	
<b>A.2 Part A / Interim Status</b>	Y	<b>.1 Correspondence</b>	
<b>.1 Correspondence</b>	Y	<b>.2 All Other Permitting Documents (Not Part of the ARA)</b>	
<b>.2 Notification and Acknowledgment</b>	Y	<b>C.1 Compliance - (Inspection Reports)</b>	Y
<b>.3 Part A Application and Amendments</b>	Y	<b>C.2 Compliance/Enforcement</b>	Y
<b>.4 Financial Insurance (Sudden, Non Sudden)</b>	X	<b>.1 Land Disposal Restriction Notifications</b>	X
<b>.5 Change Under Interim Status Requests</b>		<b>.2 Import/Export Notifications</b>	
<b>.6 Annual and Biennial Reports</b>		<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>	
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>	Y
<b>.1 Correspondence</b>		<b>.1 RFA Correspondence</b>	Y
<b>.2 Reports</b>		<b>.2 Background Reports, Supporting Docs and Studies</b>	
<b>A.4 Closure/Post Closure</b>	Y	<b>.3 State Prelim. Investigation Memos</b>	
<b>.1 Correspondence</b>	Y	<b>.4 RFA Reports</b>	X
<b>.2 Closure/Post Closure Plans, Certificates, etc</b>	X	<b>D. 2 Corrective Action/Facility Investigation</b>	
<b>A.5 Ambient Air Monitoring</b>		<b>.1 RFI Correspondence</b>	
<b>.1 Correspondence</b>		<b>.2 RFI Workplan</b>	
<b>.2 Reports</b>		<b>.3 RFI Program Reports and Oversight</b>	
<b>B.1 Administrative Record</b>		<b>.4 RFI Draft /Final Report</b>	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual folders per schedule

**A.1 Public  
Participation**



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149



January 8, 1988

Re: Premix, Inc.  
Closure Plan  
US EPA ID No.: OHD004200044  
Ohio Permit No.: 02-04-0567

Richard F. Celeste  
Governor

Premix, Inc.  
Attn: Debra Hall, CHMM  
Environmental/Industrial Hygiene Coordinator  
Harmon Road & Route 20  
N. Kingsville, Ohio 44068

Dear Madam:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for Premix, Inc. located in N. Kingsville, Ohio, will appear the week of January 11, 1988, in The Star Beacon, Ashtabula, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, February 17, 1988.

Copies of the closure plan will be available for public review at the Kingsville Public Library, Academy Street, Kingsville, Ohio 44048 and the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Please contact me at (614) 481-7217, if you have any questions concerning this matter.

Sincerely,

*Thomas E. Crepeau*

Thomas E. Crepeau  
Program Planning and Management Section  
Division of Solid & Hazardous Waste Management

TEC/dhs

cc: Rebecca Strom, U.S. EPA, Region V  
Randy Meyer, Ohio EPA, DSHWM, TA&ES  
Theresa Sabol, Ohio EPA, DSHWM, NEDO

2044R(27)

RECEIVED

JAN 13 1988

SWD - R/S  
U.S. EPA. REGION V



PUBLIC NOTICE

Ashtabula County

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: Premix, Inc., U.S. EPA ID No.: OHD004200044, Ohio Permit No.: 02-04-0567, Harmon Road & Route 20, N. Kingsville, Ohio 44068. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Kingsville Public Library, Academy Street, Kingsville, Ohio 44048 and the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Program Planning and Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149



Richard F. Celeste  
Governor

August 27, 1987

Re: Premix, Inc.  
US EPA ID No.: OHD004200044  
Ohio Permit No.: 02-04-0567  
Partial Closure Plan

Premix, Inc.  
Attn: Debra Hall  
Route 20 & Harmon Road  
N. Kingsville, Ohio 44068

Dear Madam:

A public notice acknowledging the Ohio EPA's receipt of a partial closure plan for Premix, Inc. in N. Kingsville, Ohio will appear the week of August 24, 1987, in The Star Beacon, Ashtabula, Ohio. The Director of the Ohio EPA will act upon the partial closure plan request following the close of the public comment period, September 30, 1987.

Copies of the partial closure plan will be available for public review at the Ashtabula County District Library, 335 W. 44th Street, Ashtabula, Ohio 44004 and the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Please contact me at (614) 481-7217, if you have any questions concerning this matter.

Sincerely,

Thomas E. Crepeau  
Program Planning and Management Section  
Division of Solid & Hazardous Waste Management

TEC/dhs

cc: Rebecca Strom, U.S. EPA, Region V  
Dan Fisher, OEPA, DSHWM, TA&ES  
Debbie Berg, OEPA, DSHWM, NEDO

1013R

RECEIVED

AUG 31 1987

U.S. EPA. REGION V

PUBLIC NOTICE

Ashtabula County

RECEIPT OF HAZARDOUS WASTE PARTIAL CLOSURE PLAN

For: Premix, Inc., US EPA ID No.: OHD004200044, Ohio Permit No.: 02-04-0567, Route 20 & Harmon Road, N. Kingsville, Ohio 44068. The Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Partial Closure Plan involving a container storage area for the above referenced facility.

Copies of the facility's Partial Closure Plan will be available for public review at the Ashtabula County District Library, 335 W. 44th Street, Ashtabula, Ohio 44004 and the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Comments concerning the partial Closure Plan should be submitted before September 30, 1987 to: Thomas E. Crepeau, Div. of Solid & Hazardous Waste Mgmt., Program Planning and Management Section, P.O. Box 1049, 1800 WaterMark Drive, Columbus, Ohio 43266-0149.

A.2 Part A/  
Interim Status



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

RECEIVED JUN 07 1993  
WMD RCRA  
RECORD CENTER

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

May 11, 1993

Premix Inc.  
Attn: Raymond A. Kovacs  
P.O. Box 281  
North Kingsville, OH 44068

RE: EPA ID#: OHD004200044

LOCATION of INSTALLATION: *Harmon Rd and Rte 20*  
*North Kingsville, OH 44068*

In response to your request of March 1993 the following information has been updated:

Contact: *Raymond A. Kovacs*

Status: *large quantity generator*

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

*Thomas E. Crepeau*

Thomas E. Crepeau, Manager  
Data Management Section  
Division of Hazardous Waste Management

TEC/bab

cc: U.S. EPA, Region V  
Ohio EPA District Office



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V

111 West Jackson Blvd.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
RCRA ACTIVITIES

MAY 19 1982

Debbi Hall, Env. Spec.  
Premix Inc.  
P.O. Box 281  
N. Kingsville, Ohio 44068

RE: Interim Status Acknowledgement  
FACILITY NAME: Premix Inc.

USEPA ID No. OHD004200044

Dear Ms. Hall:

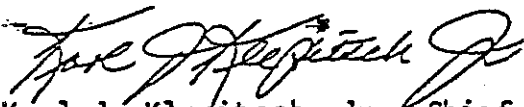
This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

  
Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

Enclosure

cc: Ford Davey, Sr. V/P



EPA ID NUMBER

0HD004200044

PREMIX, INC

PREMIX INC

HARMON RD AND RT 20  
N KINGSVILLE OH 44068

DESIGN CAPACITY

UNIT OF MEASURE

17270

## G

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	UNIT OF MEASURE	CODE
<b>STORAGE:</b>				
-----				
CONTAINER	S01	G or L	GALLONS	G
TANK	S02	G or L	LITERS	L
WASTE PILE	S03	Y or C	CUBIC YARDS	Y
SURFACE IMPOUNDMENT	S04	G or L	CUBIC METERS	C
DISPOSAL:			GALLONS PER DAY	U
-----			LITERS PER DAY	V
INJECTION WELL	D79	G,L,U, or V	TONS PER HOUR	D
LANDFILL	D80	A or F	METRIC TONS/HOUR	W
LAND APPLICATION	D81	B or Q	GALLONS/HOUR	E
OCEAN DISPOSAL	D82	U or V	LITERS/HOUR	H
SURFACE IMPOUNDMENT	D83	G or L	ACRE-FEET	A
TREATMENT:			HECTARE-METER	F
-----			ACRES	B
TANK	T01	U or V	HECTARES	Q
SURFACE IMPOUNDMENT	T02	U or V	POUNDS/HOUR	J
INCINERATOR	T03	D,W,E, or H	KILOGRAMS/HOUR	R
OTHER	T04	U,V,J,R,N, or S	TONS PER DAY	N
			METRIC TONS/DAY	S





U.S. ENVIRONMENTAL PROTECTION AGENCY

## NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transfer or principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

I. INSTALLATION'S EPA ID. NO.	OHD004200044
II. NAME OF INSTALLATION	FREMIX INC PO BOX 281 N KINGSVILLE, OH 44068
III. LOCATION OF INSTALLATION	RTE #20 & HARMOND RD N KINGSVILLE, OH 44068

000015 AUG 22 '80

FOR OFFICIAL USE ONLY

COMMENTS																							
C																							
C																							
15	16																			17			
INSTALLATION'S EPA I.D. NUMBER										APPROVED					DATE RECEIVED (yr., mo., & day)								
S	F	O	H	A	D	0	0	4	2	0	0	0	4	4	2	1	A	8	0	0	8	1	8
*	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	

## I. NAME OF INSTALLATION

[illegible]

## II. INSTALLATION MAILING ADDRESS

		STREET OR P.O. BOX																											
C	3	P	O	B	O	X	2	8	1																				
15	16																	45											
		CITY OR TOWN																ST.		ZIP CODE									
C	4	N	K	I	N	G	S	V	I	L	L	E									O	H	4	4	0	6	8		
15	16																	40	41	42	47	-	51						

### III. LOCATION OF INSTALLATION

		STREET OR ROUTE NUMBER																					
C																							
5	15	HARMON RD AND Rt 20																		45			
13	16																						
		CITY OR TOWN																		ST.		ZIP CODE	
C																							
6	15	N KINGSVILLE																		04		44068	
15	16																			40		41 42 47	


#### IV. INSTALLATION CONTACT

								<b>NAME AND TITLE</b> ( <i>last, first, &amp; job title</i> )							<b>PHONE NO.</b> ( <i>area code &amp; no.</i> )																		
<b>C</b>																																	
<b>2</b>	P	A	R	S	H	A	L	L	M	I	S	S	D	E	N	V	I	O	R	E	N	G	2	1	6	-	2	2	4	-	2	1	8
<b>15</b>	T	F	F																			A5	A6	-	B8	A9	-	S1	S2	-	S4		

### V. OWNERSHIP

[illegible]

**B. TYPE OF OWNERSHIP**  
(enter the appropriate letter into box)

F = FEDERAL M = NON-FEDERAL	<div style="border: 1px solid black; padding: 5px; text-align: center;">           4       </div>	<input checked="" type="checkbox"/> 57 A. GENERATION <input checked="" type="checkbox"/> 58 B. TRANSPORTATION (complete item VII) <input checked="" type="checkbox"/> 59 C. TREAT/STORE/DISPOSE <input type="checkbox"/> 60 D. UNDERGROUND INJECTION
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**VII. MODE OF TRANSPORTATION** (transporters only - enter "X" in the appropriate box(es))

☐ 61 A. AIR    ☐ 62 B. RAIL    ☒ 63 C. HIGHWAY    ☐ 64 D. WATER    ☐ 65 E. OTHER (specify):

### VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

<input checked="" type="checkbox"/> <b>A. FIRST NOTIFICATION</b>										<input type="checkbox"/> <b>B. SUBSEQUENT NOTIFICATION</b> <i>(complete item C)</i>									
<div style="float: right; border: 1px solid black; padding: 5px; margin-top: -10px;"> <b>C. INSTALLATION'S EPA I.D. NO.</b>  <div style="border: 1px solid black; display: flex; justify-content: space-between;"> <span>04</span><span>D</span><span>00</span><span>4</span><span>2</span><span>00</span><span>0</span><span>4</span><span>4</span> </div> </div>																			

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 19 1980



W	0	H	D	0	0	4	2	0	0	0	4	4	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F002 23 - 26	2 F005 23 - 26	3 F017 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE  
(D001)

☐ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

HBailes

NAME &amp; OFFICIAL TITLE (type or print)

PRESIDENT

DATE SIGNED

8/13/80



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• OHD004200044

REACKNOWLEDGEMENT

PREMIX INC  
PO BOX 281  
N KINGSVILLE

OH 44068

INSTALLATION ADDRESS

HARMON RD AND RT 20  
N KINGSVILLE

OH 44068



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

May 6, 1992

Premix, Inc.  
Attn: Debbie Hall  
P.O. Box 281  
North Kingsville, OH 44068

RE: EPA ID#: OHD004200044

In response to your request of April 1992 the  
following information has been updated:

Status: large quantity generator and transporter  
No longer listed as a TSD facility.

If you have any questions, please contact Beth Harris at  
(614)644-2977.

Sincerely,

Thomas E. Crepeau, Manager  
Data Management Section  
Division of Hazardous Waste Management

TEC/bah

cc: U.S. EPA, Region V



# PREMIX, INC.

P. O. BOX 281

NORTH KINGSVILLE, OHIO 44068

PHONE (216) 224-2181

January 7, 1986

RECEIVED

JAN 10 1986

SWD - AIS  
U.S. EPA, REGION V

Mr. Ken Chiu  
USEPA/Region V  
RCRA Activities  
P.O. Box A 3587  
5 SH13  
Chicago, IL 60690

Dear Mr. Chiu:

Premix, Inc., is a facility located in North Kingsville, Ohio that manufactures reinforced thermoset plastic (Sic 30-79). We are currently permitted under Storage Permit #02-04-0567. The EPA identification number is OHD004200044. *G, TR, TSD, PA*

I am in the process of reviewing ways to reduce the hazards and toxicity of the waste streams that are being generated at North Kingsville.

The waste streams are as follows:

1. Waste Resin Solution  
Flammable Liquid  
UN1866, D001  
  
which contains styrene monomer,
2. Waste Paint related materials  
Flammable Liquid  
NA 1263  
D001
3. Non-hazardous waste paste which has been approved for sanitary landfill by the Ohio EPA.

The best available technology that I have found for our use is that of solidification.

A facility by the name of Solidify Corporation, located in Eastlake, Ohio, has initiated trial samples consisting of one quart of each type of waste. The solidification occurs by blending the three above-mentioned waste streams together in a portable auger mixer and adding calcimated lime and water. This is then thoroughly mixed. Within 30 minutes following the mixing process, the water will evaporate leaving a solid non-hazardous mass.

The solid mass was analyzed for ignitability and E.P. Toxicity (due to the styrene monomer) results are attached.

Mr. Ken Chiu  
Page Two  
January 7, 1986

I would like approval for a one-time trial at the North Kingsville facility using a large enough quantity (yet to be determined) to judge the feasibility of the solidification process.

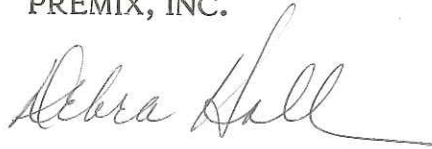
If approval is granted for a one-time exemption under Ohio Code #3734.02g, I would need approximately a 30 to 60 day allowance period to edify the trial process due to the severe weather conditions in this area.

I have previously spoken to Mr. Bob Carry, Ohio EPA, and Ms. Debby Burg regarding this exemption.

If there are any questions pertaining to this request, please do not hesitate to phone.

Sincerely yours,

PREMIX, INC.



Debra Hall  
Environmental Engineer

cc: Ms. D. Burg  
Ohio EPA  
2110 E. Aurora Rd.  
Twinsburg, OH 44087

Mr. B. Carey  
Ohio EPA  
P.O. Box 1049  
Columbus, OH 43215

Mr. F. Davey  
Premix, Inc.

**P**REMIX, INC.

P. O. BOX 281  
44068

NORTH KINGSVILLE, OHIO

DEBRA HALL

ENVIRONMENTAL ENGINEER

PHONE: 216 224-2181  
TWX: 810 427-2929



# PREMIX, INC.

P. O. BOX 281

NORTH KINGSVILLE, OHIO 44068

PHONE (216) 224-2181

September 21, 1982

G, T, TSD, PA  
DH0004200044

USEPA  
RCRA Activities  
Region V  
Box A 3587  
Chicago, IL 60690

RECEIVED

SEP 27 1982

WASTE MANAGEMENT BRANCH  
EPA, REGION V

To whom it may concern:

On Form 3 for our storage permit we had initially listed that we generate three (3) types of hazardous waste, F002, F003, F005 being stillbottoms from our solvent recovery unit; D001 paint from our paint spraying process; and D001 resin paste from our material process.

The waste D001 or resin paste we had analyzed by two outside laboratories for ignitability. We felt that this waste was improperly classified as a flammable solid. The OEPA was notified and on their inspection tour of our facility, they witnessed bench demonstrations of trying to ignite this waste. They were also shown copies of the data received from the private labs.

Due to the above information the OEPA agreed that this resin waste was not a flammable solid hazardous waste and should be reclassified.

Attached is a copy of the letter received on the change of classification.

Please attach this information to the Part A form for our storage permit.

Sincerely,

PREMIX, INC.



Mrs. I  
Enviro

**PREMIX, INC.**

P. O. BOX 281  
44068

NORTH KINGSVILLE, OHIO

mkl

Attachment

DEBBI HALL

ENVIRONMENTAL SPECIALIST

PHONE 216 224-2181

# PREMIX, INC.

P. O. BOX 281

NORTH KINGSVILLE, OHIO 44068

PHONE (216) 224-2181

April 7, 1982

04D004 200044

Mr. Joel Schaffer  
RCR Activities (?)  
USEPA  
Region 5  
P. O. Box A3587  
Chicago, IL 60690


Dear Mr. Schaffer:

Attached you will find a copy of the map that accompanied our Part "A" form that was filed with Ohio EPA.

If the map is not specific enough, please contact our Plant Engineer, Mr. Mark Fickenscher, and he will try to find something in our files that will help you. Thank you for your patience.

Sincerely,

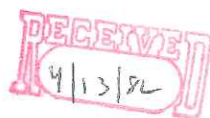
PREMIX, INC.



Mrs. Debbie Hall  
Environmental Specialist

mkl

Attachment



RECEIVED

APR 16 1982

WASTE MANAGEMENT BRANCH  
EPA, REGION V

# PREMIX, INC.

P. O. BOX 281  
44068

NORTH KINGSVILLE, OHIO

DEBBI HALL

ENVIRONMENTAL SPECIALIST

PHONE 216 224-2181



<b>FORM</b> <b>1</b> <b>GENERAL</b>		<b>ENVIRONMENTAL PROTECTION AGENCY</b> <b>GENERAL INFORMATION</b> Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	<b>I. EPA I.D. NUMBER</b> <div style="border: 1px solid black; padding: 2px; display: inline-block;"> <b>F</b> OHD004200044         </div>
<b>LABEL ITEMS</b> <b>II. EPA I.D. NUMBER</b>  <b>III. FACILITY NAME</b>  <b>V. FACILITY MAILING ADDRESS</b>   <b>VI. FACILITY LOCATION</b>		<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">           OHD004200044             PREMIX INC.            P.O. BOX 281            N. KINGSVILLE, OH 44068         </div> <div style="border: 1px solid black; padding: 5px;">           HARMON RD. &amp; Rt. 20         </div>	

**GENERAL INSTRUCTIONS**

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

**II. POLLUTANT CHARACTERISTICS**

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

**III. NAME OF FACILITY**

1	SKIP	PREMIX, INC.
---	------	--------------

**IV. FACILITY CONTACT**

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 PARSHALL, DEBBI ENVIRONMENTAL SPECIALIST	216 224 2181

**V. FACILITY MAILING ADDRESS**

A. STREET OR P.O. BOX			
3 P.O. BOX 281			
B. CITY OR TOWN	C. STATE	D. ZIP CODE	
4 N. KINGSVILLE	OH	44068	

**VI. FACILITY LOCATION**

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 HARMON RD. AND RT. 20			
B. COUNTY NAME			
ASHTABULA			
C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 N. KINGSVILLE	oh	44068	007



## VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
C	7	3079	(specify)	C	7		(specify)
15	16	17	18	15	16	17	18
MISC. PLASTIC PRODUCTS							
C. THIRD				D. FOURTH			
C	7		(specify)	C	7		(specify)
15	16	17	18	15	16	17	18

## VIII. OPERATOR INFORMATION

A. NAME															B. Is the name listed in Item VIII-A also the owner?					
C	8	PREMIX, INC.													56	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
15	16														55					
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															D. PHONE (area code & no.)					
F = FEDERAL    M = PUBLIC (other than federal or state) S = STATE    O = OTHER (specify)															C	A	216	224	2181	
P STOCKHOLDERS															15	16	17	18	19	20
E. STREET OR P.O. BOX																				
P.O. BOX 281																				
26															55					
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND						
C	B	N. KINGSVILLE								OH	44068	Is the facility located on Indian lands?								
15	16									40	41	42	43	44	45					
												<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO								

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
C	T	I								C	T	I							
9	N		15	16	17	18	19	20	21	9	P		15	16	17	18	19	20	21
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
C	T	I								C	T	I							
9	U		15	16	17	18	19	20	21	9			15	16	17	18	19	20	21
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
C	T	I								C	T	I							
9	R		15	16	17	18	19	20	21	9			15	16	17	18	19	20	21

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9 B/50

## XII. NATURE OF BUSINESS (provide a brief description)

COMPOUNDING AND MOLDING OF FIBERGLASS REINFORCED POLYESTER'S

F9 A/51

## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
FORD DAVEY Senior Vice PRESIDENT	<i>David - Davey</i>	Nov 18 1980

## COMMENTS FOR OFFICIAL USE ONLY

C	C
15	16

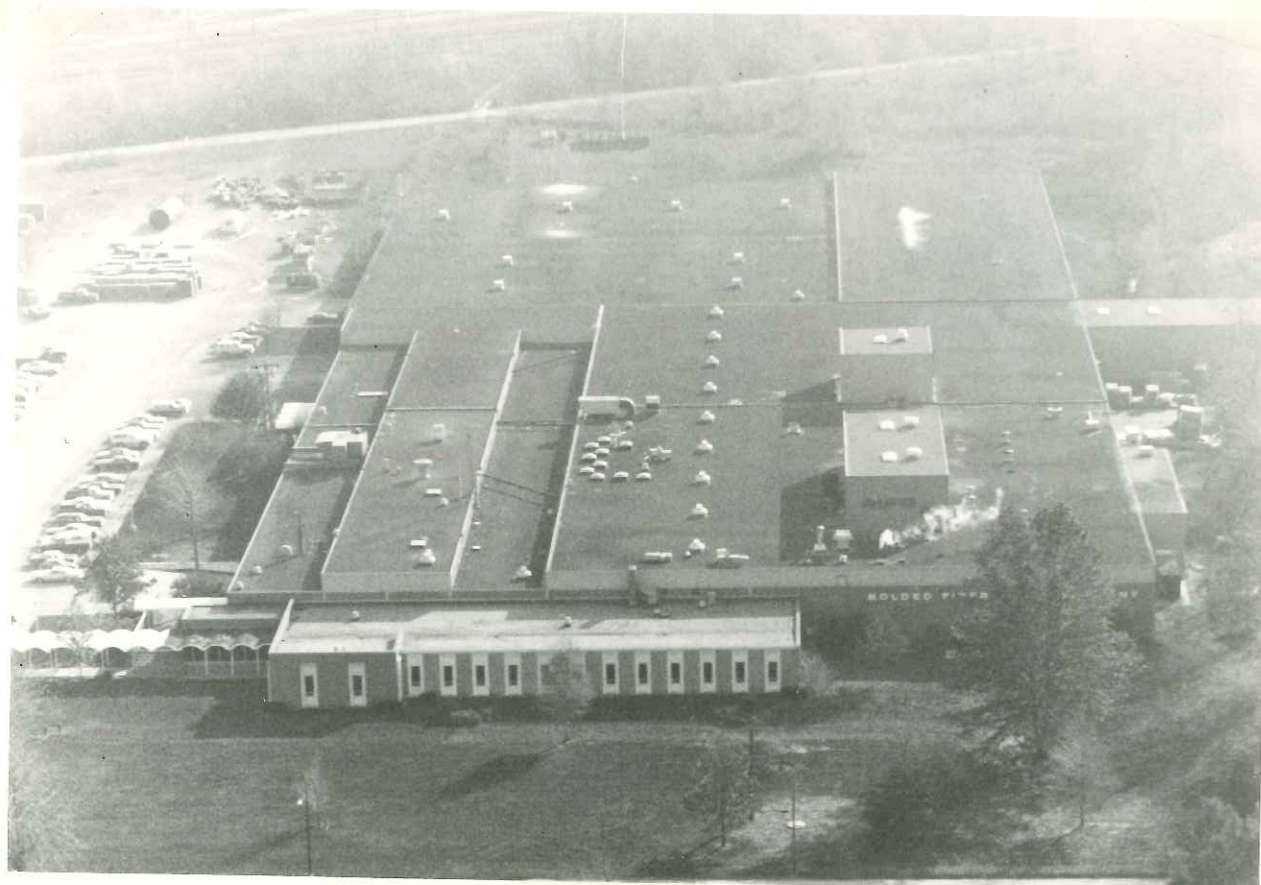




PLANT #1 11/23/80  
MFG



PLANT #1 11/23/80  
MFG



MOLDED FIBER GLASS CO.  
4401 BENEFIT AVE.  
ASHTABULA, OH. 44004

ID# OHD 049 375 215

PHOTOS



232

<b>FORM 3</b> RCRA		 <b>EPA</b>	<b>ENVIRONMENTAL PROTECTION AGENCY</b> <b>HAZARDOUS WASTE PERMIT APPLICATION</b> <i>Consolidated Permits Program</i> <small>(This information is required under Section 3005 of RCRA.)</small>		<b>I. EPA I.D. NUMBER</b> S <table border="1" style="display: inline-table; border-collapse: collapse;"><tr><td>0</td><td>H</td><td>D</td><td>00</td><td>42</td><td>000</td><td>44</td><td>3</td><td>1</td></tr></table> T A C		0	H	D	00	42	000	44	3	1																																																																
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Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.																																																																															
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<input type="checkbox"/> <b>2. NEW FACILITY</b> (Complete item below.)																																																																															
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<b>A. PROCESS CODE</b> - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).																																																																															
<b>B. PROCESS DESIGN CAPACITY</b> - For each code entered in column A enter the capacity of the process.																																																																															
1. AMOUNT - Enter the amount.																																																																															
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.																																																																															
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<b>EXAMPLE FOR COMPLETING ITEM III</b> (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.																																																																															
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1	T 0 1	30000	U		7																																																																										
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3					9																																																																										
4					10																																																																										



**III. PROCESSES** (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS . . . . .	P	KILOGRAMS . . . . .	K
TONS . . . . .	T	METRIC TONS . . . . .	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV** (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above



EPA Form 3510-3 (6-80)



E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S							T/A	C
F	OHD064208944						3	6
1	2						13	14 15

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*). F6 N/56

## LATITUDE (degrees, minutes, &amp; seconds)

74	38	
65 66	67 68	69 - 71

LONGITUDE (degrees, minutes, &amp; seconds)

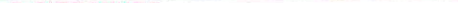
[illegible]

**IX** A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

**B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:**

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)																			
STOCKHOLDERS															216 224 2181																			
3. STREET OR P.O. BOX															4. CITY OR TOWN										5. ST.					6. ZIP CODE				
P.O. BOX 281															N. KINGSVILLE										OH					44068				

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Ford Davey Senior Vice PRESIDENT		Nov. 18 1980

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

<b>FORM</b> <b>3</b> <b>RCRA</b>		<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>HAZARDOUS WASTE PERMIT APPLICATION</b> Consolidated Permits Program <i>(This information is required under Section 3005 of RCRA.)</i>	<b>I. EPA I.D. NUMBER</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">S</td> <td style="width: 10%;">F</td> <td style="width: 10%;">O</td> <td style="width: 10%;">H</td> <td style="width: 10%;">D</td> <td style="width: 10%;">O</td> <td style="width: 10%;">4</td> <td style="width: 10%;">9</td> <td style="width: 10%;">3</td> <td style="width: 10%;">7</td> <td style="width: 10%;">5</td> <td style="width: 10%;">2</td> <td style="width: 10%;">1</td> <td style="width: 10%;">5</td> <td style="width: 10%;">T/A</td> <td style="width: 10%;">C</td> </tr> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5</td> <td>6</td> <td>7</td> <td>8</td> <td>9</td> <td>10</td> <td>11</td> <td>12</td> <td>13</td> <td>14</td> <td>15</td> <td>16</td> </tr> </table>	S	F	O	H	D	O	4	9	3	7	5	2	1	5	T/A	C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
S	F	O	H	D	O	4	9	3	7	5	2	1	5	T/A	C																				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16																				

II. FIRST OR REVISED APPLICATION																							
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.																							
<table style="width:100%;"> <tr> <td style="width:50%; vertical-align: top;"> <b>A. FIRST APPLICATION</b> (place an "X" below and provide the appropriate date)  <input checked="" type="checkbox"/> <b>1. EXISTING FACILITY</b> (See instructions for definition of "existing" facility. Complete item below.)  <table style="width: 100%;"> <tr> <td style="width: 33%;">YR.</td> <td style="width: 33%;">MO.</td> <td style="width: 33%;">DAY</td> </tr> <tr> <td>8</td> <td>5</td> <td>6</td> </tr> </table> </td> <td style="width:50%; vertical-align: top;"> <input type="checkbox"/> <b>2. NEW FACILITY</b> (Complete item below.)            FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., &amp; day) OPERATION BEGAN OR IS EXPECTED TO BEGIN.  <table style="width: 100%;"> <tr> <td style="width: 33%;">YR.</td> <td style="width: 33%;">MO.</td> <td style="width: 33%;">DAY</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </table> </td> </tr> </table>										<b>A. FIRST APPLICATION</b> (place an "X" below and provide the appropriate date) <input checked="" type="checkbox"/> <b>1. EXISTING FACILITY</b> (See instructions for definition of "existing" facility. Complete item below.) <table style="width: 100%;"> <tr> <td style="width: 33%;">YR.</td> <td style="width: 33%;">MO.</td> <td style="width: 33%;">DAY</td> </tr> <tr> <td>8</td> <td>5</td> <td>6</td> </tr> </table>	YR.	MO.	DAY	8	5	6	<input type="checkbox"/> <b>2. NEW FACILITY</b> (Complete item below.) FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN. <table style="width: 100%;"> <tr> <td style="width: 33%;">YR.</td> <td style="width: 33%;">MO.</td> <td style="width: 33%;">DAY</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </table>	YR.	MO.	DAY			
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YR.	MO.	DAY																					
8	5	6																					
YR.	MO.	DAY																					
<b>B. REVISED APPLICATION</b> (place an "X" below and complete Item I above) <input checked="" type="checkbox"/> <b>1. FACILITY HAS INTERIM STATUS</b> <input type="checkbox"/> <b>2. FACILITY HAS A RCRA PERMIT</b>																							

**III. PROCESSES - CODES AND DESIGN CAPACITIES**

**A. PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

**B. PROCESS DESIGN CAPACITY** - For each code entered in column A enter the capacity of the process.  
 1. AMOUNT - Enter the amount.  
 2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>			<b>Treatment:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
<b>Disposal:</b>			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
		UNIT OF MEASURE CODE			UNIT OF MEASURE CODE
GALLONS		G	LITERS PER DAY		V
LITERS		L	TONS PER HOUR		D
CUBIC YARDS		Y	METRIC TONS PER HOUR		W
CUBIC METERS		C	GALLONS PER HOUR		E
GALLONS PER DAY		U	LITERS PER HOUR		H
ACRE-Feet		A			
HECTARE-METER		F			
ACRES		B			
HECTARES		Q			

**EXAMPLE FOR COMPLETING ITEM III** (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

<b>DUP</b>									
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY		
X-1	S 0 2	600		5					
X-2	T 0 3	20		6					
1	S 0 1	300		7					
	S 0 1	200		8					
3	S 0 1	50		9					
4				10					



FOR OFFICIAL USE ONLY

~~COMMENT~~

Place an "X" in the appropriate box in A or B below (*mark one box only*) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

☐ 2. NEW FACILITY (Complete item below.)

YR.	MO.	DAY

FOR NEW FACILITIES,  
 PROVIDE THE DATE  
 (yr., mo., & day) OPERA-  
 TION BEGAN OR IS  
 EXPECTED TO BEGIN.

☐ 2. FACILITY HAS A RCRA PERMIT

**A. PROCESS CODE** — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (*including its design capacity*) in the space provided on the form (*Item III-C*).

**B. PROCESS DESIGN CAPACITY** — For each code entered in column A enter the capacity of the process.

2. **UNIT OF MEASURE** — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS			PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS			PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>					<b>Treatment:</b>				
CONTAINER (barrel, drum, etc.)					TANK				
TANK					SURFACE IMPOUNDMENT				
WASTE PILE					INCINERATOR				
SURFACE IMPOUNDMENT					OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)				
<b>Disposal:</b>									
INJECTION WELL					T04				
LANDFILL									
LAND APPLICATION									
OCEAN DISPOSAL									
SURFACE IMPOUNDMENT									
UNIT OF MEASURE			UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE			UNIT OF MEASURE CODE	UNIT OF MEASURE
GALLONS . . . . .			G	LITERS PER DAY . . . . .	V			ACRE-FEET . . . . .	A
LITERS . . . . .			L	TONS PER HOUR . . . . .	D			HECTARE-METER . . . . .	F
CUBIC YARDS . . . . .			Y	METRIC TONS PER HOUR . . . . .	W			ACRES . . . . .	B
CUBIC METERS . . . . .			C	GALLONS PER HOUR . . . . .	E			HECTARES . . . . .	Q
GALLONS PER DAY . . . . .			U	LITERS PER HOUR . . . . .	H				

**EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below):** A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

<div style="display: flex; justify-content: space-between;"> <span>8</span> <span>T/A C</span> </div> <div style="display: flex; justify-content: space-between;"> <span>DUP</span> <span>1</span> </div>												
<div style="display: flex; justify-content: space-between;"> <span>1 2</span> <span>13 14 15</span> </div>												
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY			FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY			FOR OFFICIAL USE ONLY	
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)					1. AMOUNT	2. UNIT OF MEASURE (enter code)			
		16 - 18 19	27	28	29 - 32			16 - 18 19	27	28	29 - 32	
X-1	S 0 2	600	G			5						
X-2	T 0 3	20	E			6						
1	S 0 1	17270.000 <u>71.96</u>	<del>G</del>			7						
2						8						
3						9						
4						10						



**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR R DESCRIBING OTHER PROCESSES (code "T04" FOR EACH PROCESS ENTERED) HERE  
INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

**A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE  
POUNDS . . . . . P  
TONS . . . . . T

METRIC UNIT OF MEASURE CODE  
KILOGRAMS . . . . . K  
METRIC TONS . . . . . M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE												
W 004200044													W DUP												
DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES												
W NO JZ	A. EPA HAZARD. WASTE NO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE			C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in 1)													
	23	24	25	26	27	28		29	30	31	32	33	34	35											
1	F	0	0	2	26,000		P	S	0	1					F003 + F005 included with F002 D003 proved incorrect - Waste is ignitable, but NOT REACTIVE. Our PAINT RESIDUES ARE IGNITABLE. This D001 is ACUTALLY F017 was										
2	D	0	0	1	133,200		P	S	0	1															
3	D	0	0	1	20,000		P	S	0	1															
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E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE

EPA I.D. NO. (enter from page 1)												
S											T/A	C
F	0	H	D	0	0	4	2	0	0	0	4	6

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

## LATITUDE (degrees, minutes, &amp; seconds)

74	38	
65 66	67 68	69 - 71

LONGITUDE (degrees, minutes, &amp; seconds)

		3		02			
72	-	74	75	76	77	-	79

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.


B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER2. PHONE NO. (area code & no.)

STOCKHOLDERS													216	224	2181			
18	16											55	56	58	59	61	62	65

3. STREET OR P.O. BOX				4. CITY OR TOWN				5. ST.		6. ZIP CODE			
C				C									
F	P.O. BOX 281			G	N. Kingsville			OH				44058	
40	41	42		40	41	42		40	41	42		47	48

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

<p>A. NAME (print or type)</p> <p>Ford Davey Senior Vice President</p>	<p>B. SIGNATURE</p> 	<p>C. DATE SIGNED</p> <p>Nov. 18 1980</p>
--	--	---

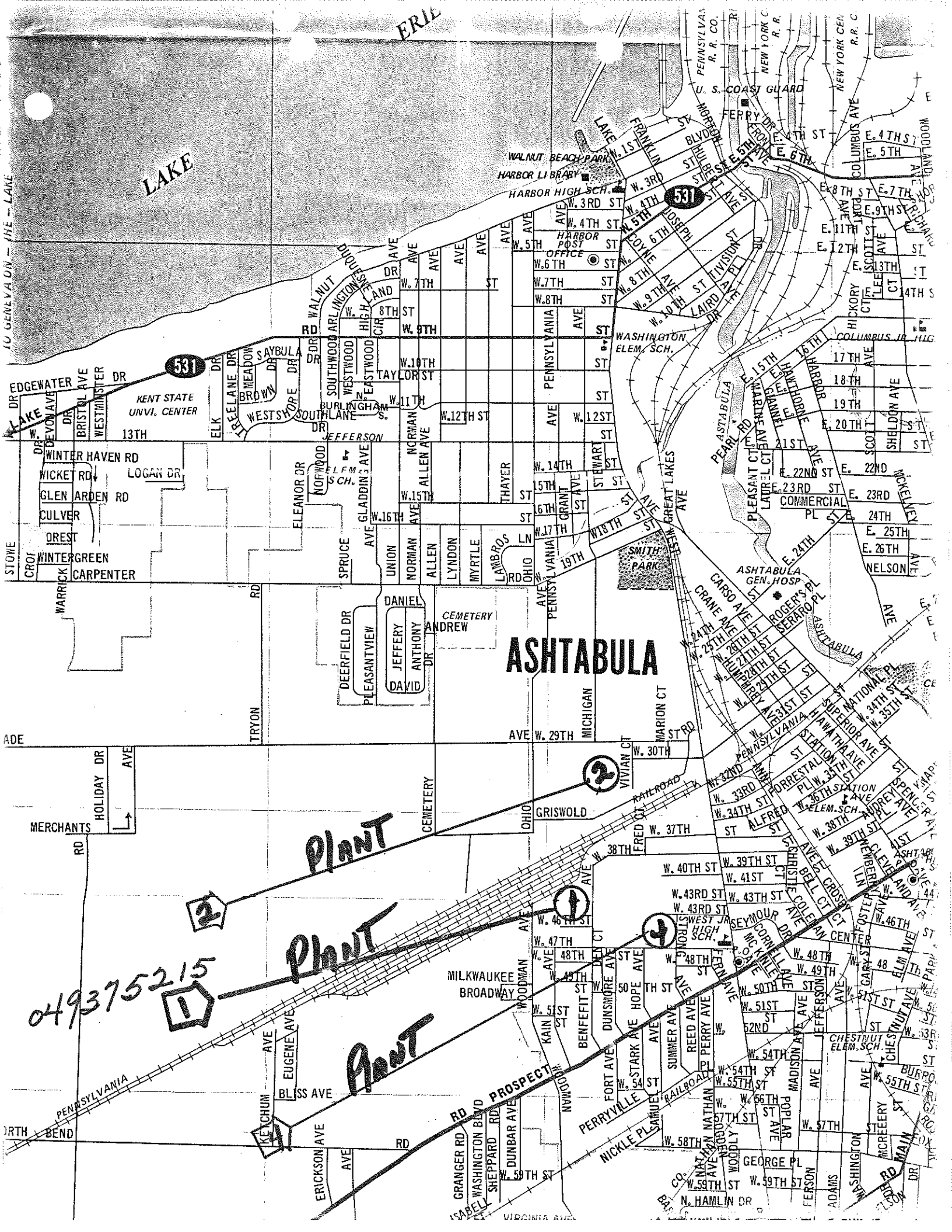
*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
-------------------------	--------------	----------------

**V. FACILITY DRAWING** (see page 4)

SEE ATTACHED

Copy



**A.4 Closure/Post-  
Closure**

# PREMIX, INC.

P.O. BOX 281

NORTH KINGSVILLE, OHIO 44068

PHONE (216) 224-2181

comp  
**RECEIVED**

MAY 20 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION VI

May 13, 1992

USEPA  
Division of Hazardous Waste Management  
230 South Dearborn Street  
Chicago, IL 60604

To Whom It May Concern:

Recently I located a file here at my office pertaining to the closure of a hazardous waste storage area (Permit #02-04-0567) here at Premix, Inc. (EPA ID #OHD004200044). A post-closure inspection was conducted on Friday, August 11, 1989 by Marion Toumazos, Ohio EPA. Ohio EPA has since recognized that the area has been closed in accordance with the Ohio Administrative Code (see enclosure).

However, I could not locate any documentation from USEPA regarding their acceptance of this closure. Therefore, through this letter, I respectfully request documentation from USEPA verifying that this area is indeed closed.

If this request is unclear or if you have any questions, feel free to contact me at the above address/telephone number (extension 295). Thank you for your attention to this matter, your assistance is greatly appreciated.

Sincerely,

  
Raymond A. Kovacs, CHMM  
Environmental Manager

XC: F. Davey, Premix, Inc.  
M. Fickenscher, Premix, Inc.  
T. Warren, Esq., Warren & Young, Attorneys at Law

PREMIX IS PEOPLE



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

April 20, 1992

Re: Premix, Inc.  
EPA ID No.: OHD004200044  
Ohio ID No.: 02-04-0567  
Completion of Closure

Premix, Inc.  
Attn: Debbie Hall  
PO Box 281  
North Kingsville, Ohio 44068

Dear Ms. Hall:

According to our records, on April 18, 1988, the Director of Ohio EPA approved a closure plan submitted by Premix, Inc. for the hazardous waste concrete container storage pad located at Harmon Road & Route 20, North Kingsville, Ohio 44068. On August 3, 1989, Premix, Inc. submitted to the Director certification documents that the hazardous waste concrete container storage pad had been closed according to the specifications in the approved closure plan. Ohio EPA District Office personnel completed a certification of closure inspection and a review of documents pertaining to the hazardous waste concrete container storage pad on September 26, 1989. Based on this inspection and review, the Ohio EPA has determined that the hazardous waste concrete container storage pad has been closed in accordance with the approved closure plan and Rules 3745-66-12 through 3745-66-15 of the Ohio Administrative Code (OAC) and Premix, Inc. will maintain the status of a generator of hazardous waste.

You should continue to use the identification number assigned to you for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements as appropriate.

If you have any questions concerning your current status, please contact the Ohio EPA, Northeast District Office, Attn: Nancy Zikmanis, 2110 East Aurora Road, Twinsburg, Ohio 44087, tel.: (216) 425-9171.

In accordance with Rules 3745-66-43(H) and 3745-66-47(E) of the OAC, Premix, Inc. will not be required to maintain financial assurance for closure costs and liability coverage for accidental occurrences at this facility.



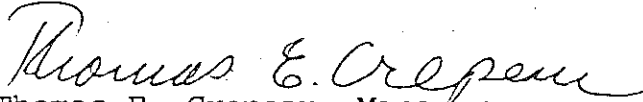


April 20, 1992  
Premix, Inc.  
Completion of Closure  
Pg. 2

Please note that this letter does not relieve you of any corrective action responsibilities that may be required.

Should you have further questions concerning this procedure, please call Randy Sheldon, Data Management Section at (614) 644-2977.

Very truly yours,



Thomas E. Crepeau, Manager  
Data Management Section  
Division of Hazardous Waste Management

TC/rs

cc: Randy Meyer, RCRA TAS, DHWM  
Laurie Stevenson, HW ES, DHWM  
Beth Harris, DMS, DHWM  
Rhonda Rothschild, DMS, DHWM  
Nancy Zikmanis, DHWM, NEDO  
File

# PREMIX, INC.

P. O. BOX 281

NORTH KINGSVILLE, OHIO 44068

PHONE (216) 224-2181

July 27, 1989

RECEIVED  
AUG 04 1989

U.S. EPA Region 5  
Waste Management Division  
230 South Dearborn Street  
Chicago, IL 60604

U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
OFFICE OF THE DIRECTOR

Gentlemen:

This is to notify you that the closure, OAC 3745-66, for the permitted storage facility at Premix, Inc., North Kingsville has been completed in an environmentally safe manner and that we are functioning under generator regulations 40 CFR 262.

Enclosed are the original request for closure; the Ohio EPA letter from Richard L. Shank dated April 18, 1988; and the Free-Col Laboratories, Inc. analytical report form dated June 12, 1989 needed to complete the full closure for Premix, Inc., North Kingsville facility, EPA ID# 004200044, Permit #02-04-0567.

If there are any questions, I can be reached at (216) 224-2181, Extension 295.

Respectfully,

PREMIX, INC.

Brenda L. Ritchie

dgl

Enclosures

RECEIVED  
AUG 1 1989  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

CHARLES H. GROSSMAN, P.E.

CONSULTING ENGINEER

7805 LAUREN J. DRIVE

(216) 255-8863

MENTOR, OHIO 44060

June 3, 1988

To Whom It May Concern  
& Premix, Incorporated  
P. O. Box 281  
North Kingsville, Ohio 44125

Re: Completion of Partial Closure  
Premix, Incorporated Facility  
North Kingsville, Ohio  
OH004200044

I certify under penalty of law that this document and all attachments were prepared under the direction and supervision of Debra Parshall Hall, CHMM in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Very truly yours,

*Charles H. Grossman*  
Charles H. Grossman, P. E.

In cooperation with:

*Debra Parshall-Hall*  
Premix, Incorporated  
Debra Parshall-Hall, CHMM

Encl: Request for Partial Closure dated February 26, 1987  
U.S.E.P.A. Letter from Basil G. Constantelos Dated December 2, 1987  
Professional Service Industries' Report on Soil Boring Operations  
and Laboratory Testing Operations-Waste Storage Area dated  
February 8, 1988

**PREMIX, INC.**

P. O. BOX 281  
44068

NORTH KINGSVILLE, OHIO

OHIO 004 200 044

RECEIVED  
MAY 02 1989

May 2, 1989

Ms. Marion Toumazos  
Ohio EPA, DHSWM  
2110 E. Aurora Road  
Twinsburg, Ohio 44087

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Dear Ms. Toumazos:

On April 21, 1989, you notified the Premix, Inc., North Kingsville facility that the closure plan submitted December 21, 1987 was in violation of closure proceedings under Rule 3745-66-12 of the Ohio Administrative Code.

This letter is to inform you that the storage facility closure has been initiated in accordance with OAC 3745-66-12(A&B). The closure will consist of a new accumulation area being built, start date for construction is set for May 1, 1989.

The storage facility will be closed in a manner that minimizes the need for further maintenance, controls and maintains to the maximum extent necessary protection of human health and the environment, OAC 3745-66-22(A)(B), OAC 3745-66-12(1).

The drum storage shall be swept and the sweepings shall be managed as hazardous wastes. The foundation for the storage area will be pressure rinsed with water. The rinseate will be collected and analyzed using US EPA publication SW-846, "Test Methods for Evaluating Solid Wastes". Volatiles analyzed for shall be methylene chloride, acetone, toluene and pyridine using SW-846 Methods 8240 and 8250. Methyl isobutyl ketone and methyl ethyl ketone will be analyzed by SW-846 Method 8015. Lead and chromium will be analyzed by SW-846 methods.

The storage foundation shall be examined for fissures. Should any fissure be found, soil analysis will be performed in six inch increments to a depth of one foot. If soil sampling is necessary, analysis using SW-846 Methods 8016, 8240 and 8250 will be performed. Samples will be analyzed for the presence of methylene chloride, acetone, toluene, pyridine, methyl ethyl ketone, methyl isobutyl ketone, lead and chromium.

If further action is required for soil analysis, it will be addressed at that time.

A detailed drawing of the storage area is enclosed that explains the area in concern and how diking will be done.

At the conclusion of the decontamination, an independent registered engineer

Ms. Marion Toumazos  
Page Two  
May 2, 1989

will verify the closure was completed according to the plan OAC 3745-50-42 and a written certification OAC 3745-50-42(D) by said engineer will be included.

If there are any further questions, I can be contacted at (216) 224-2181, Ext. 295.

Sincerely,

PREMIX, INC.

Debra Parshall-Hall, CHMM

dgl

Enclosure

cc: Mr. G. Hamper, 5HS-13 ✓  
Ohio Permit Unit  
US EPA Region V  
230 S. Dearborn Street  
Chicago, IL 60404

Mr. Tom Crepeau, DSHWN  
Data Management Unit  
OEPA  
P.O. Box 1049  
Columbus, OH 43266-1049

Mr. Ford Davey  
Mr. Jeff Davis  
Mr. David Randall  
Premix, Inc.



**PREMIX, INC.**

P. O. BOX 281  
44068

NORTH KINGSVILLE, OHIO

RECEIVED

June 30, 1988

JUL 08 1988

U. S. EPA, REGION V  
SWB — PMS

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

RECEIVED  
JUL 05 1988

Ms. Teresa Sabol, DHSWM  
OEPA  
Northeast District Office  
2110 E. Aurora Road  
Twinsburg, Ohio 44087

SUBJECT: Partial Closure Plan

Dear Ms. Sabol:

This packet contains the information needed to complete the partial closure for Premix, Inc., North Kingsville facility, EPA ID #OHD 004200044, Permit #02-04-0567.

Enclosed is the original "Request for Closure" dated February 26, 1987; the soil boring and laboratory testing operations, dated February 8, 1988; the letter from USEPA approving closure dated May 31, 1988; and a letter from Charles H. Grossman, P.E., certifying the closure.

This information should finalize the partial closure and show our good faith in insuring protection of human health and the environment.

If there are any question, I can be contacted at ((216) 224-2181, Ext. 295.

Sincerely,

PREMIX, INC.



Debra Parshall-Hall CHMM

dgl

Enclosures

cc: Mr. George Hamper ✓  
Ohio Permit Unit  
USEPA

Mr. Thomas Crepeau, DHSWM  
Program Planning & Management Section

Mr. Ford Davey  
Mr. Mark Fickenschner  
Premix, Inc.

31 MAY 1988

# CERTIFIED MAIL

5H-12

Debra Parshall-Hall  
Premix, Incorporated  
Post Office Box 281  
North Kingsville, Ohio 44068

RE: Partial Closure Plan  
Premix, Incorporated  
OHD 004 200 044

Dear Ms. Parshall-Hall:

The United States Environmental Protection Agency (U.S. EPA) received a copy of the above-referenced facility's partial closure plan on December 29, 1987. This plan was previously submitted to the Ohio Environmental Protection Agency (OEPA) on December 22, 1987. The plan concerned the closure of a hazardous waste container storage area located at the facility.

The OEPA approved the plan conditionally, in a letter dated April 18, 1988. The U.S. EPA approves the closure plan submitted by Premix, Incorporated, with the conditions stipulated by the OEPA in the April 18, 1988, letter.

If you have any further questions, please contact Ms. Rebecca Strom of my staff, at (312) 886-6194.

Sincerely,

Basil G. Constantelos, Director  
Waste Management Division

cc: Randy Meyer, OEPA  
Tony Sasson, OEPA  
Teresa Sabol, OEPA-NEDO

5HS-13:Strom:vmc

05/24/88

Disk #4

525-88

RCIA PERMIT NO. DATE	TYP.	AUTH.	IL CHIEF	IN CHIEF	ML CHIEF	RPB/WI CHIEF	OH CHIEF	RPB CHIEF	O.R. A.D.D.	WMD
725/88 vmc		BLV					YR 5/22/88	YR 5/25/88	WEN 5/17/88	

EP 5-27-88



**PREMIX, INC.**

P. O. BOX 281  
44068

NORTH KINGSVILLE, OHIO

February 19, 1988

Ms. Teresa Sabol, DSHWM  
OEPA  
Northeast District Office  
2110 E. Aurora Road  
Twinsburg, Ohio 44087

RE: Closure Plan  
Premix, Inc.  
OH0004200044, O2-04-0567

RECEIVED

MAR 04 1988

U. S. EPA, REGION V  
SWB - PMS

MAR 03 1988

U.S. EPA, REGION V

Dear Ms. Sabol:

On this date, soil analysis results were received from the December 18, 1987 test borings.

In accordance with the letter dated October 15, 1987, from Richard L. Shank, PH. D, Director OEPA Columbus, the following modifications have been completed.

1. Soil samples collected in the area designated in the plan, collected using appropriate method found in 40 CFR 261 Appendix I.
2. Soil samples collected to a minimum depth of one foot.
3. Soil samples handled and analyzed for organic contaminants using Method 8240 and Method 8250 found in USEPA publication SW-846, for the presence of methylene chloride, acetone, toluene, pyridine, methanol, chloroform and styrene.

The attached pages contain the procedure that was used for collection of samples, decontamination of sampling/boring equipment, and disposal of rinseates.

The laboratory results, listed on Page Four of the attachment, are reported in microgram per kilogram (PPB) with the exception of Methanol that is reported in milligrams per kilogram (dry weight).

Upon discussion with the laboratory (Aquatest) who performed the analysis, the results are non-detectable, and the variation seen from sample to sample is the result of the matrix analyzed.

The last pages consist of the description of each boring, and the sampling depth.

**PREMIX, INC.**

P. O. BOX 281  
44068

NORTH KINGSVILLE, OHIO

December 21, 1987

Mr. Tom Crepeau, DSHWM  
Data Management Unit  
Ohio EPA  
P.O. Box 1049  
Columbus, Ohio 43266-1049

Dear Mr. Crepeau:

Attached is a request for closure of a waste storage unit, OAC 3745-66-12 (C), for Premix, Inc., North Kingsville facility, EPA ID OHD 0042 00044, Permit No. 02-04-0567.

If there are any questions, I can be contacted at (216) 224-2181, Ext. 295.

Sincerely,

PREMIX, INC.



Debra Parshall-Hall, CHMM  
Environmental/Industrial Hygiene Coordinator

dgl

Attachment

cc: Mr. G. Hamper, 5HS-13 ✓  
Ohio Permit Unit  
U.S. EPA Region V  
230 South Dearborn Street  
Chicago, IL 60404

Ms. Teresa Sabol  
OEPA  
Twinsburg, Ohio

Mr. F.M. Davey  
Mr. M. Fickenscher  
Mr. D. Batchelor  
Premix, Inc.

RECEIVED

DEC 29 1987

U.S. EPA - Rm 5 NV

COPY

5H-12

RE: Partial Closure Plan  
Premix, Incorporated  
OHD 004200044

5HS/Strom:vw      11/20/87      Disk #3  
                         11/23/87      revised

11/23	TYP.	AUTH.	IL CHIEF	IN. CHIEF	ML CHIEF	MIN/WI CHIEF	OH. CHIEF	TPS CHIEF	SWB CHIEF	WMD DIR
INIT. DATE	Vm	RLS 11/28/87					GHT 11/24/87	KSB 11/25/87	11/30/87	11/30/87

44-1-2-1-97



MAY 11 1984

SHW-13

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. L. E. Perkey  
Premix, Inc.  
P.O. Box 281  
North Kingsville, Ohio 44069

Re: Premix, Inc.  
North Kingsville, Ohio  
U.S. EPA ID #: OHD 004-200-044

Dear Mr. Perkey:

The enclosed financial instruments--naming the United States Environmental Protection Agency as the beneficiary--were submitted for the referenced hazardous waste management facility. This is required by the Resource Conservation and Recovery Act to ensure that funds are available to cover costs of closure and post-closure activities, should the facilities cease operation. Closure and post-closure activities are done to clean up sites to leave them environmentally safe.

As part of the process to transfer hazardous waste management programs to the States, the Ohio Environmental Protection Agency has been authorized to administer the financial responsibility program. This means that new financial instruments--naming the Ohio Environmental Protection Agency as the beneficiary--must be submitted to the State; consequently, we consent to the termination of the present financial instrument.

The new financial instruments--naming the Ohio Environmental Protection Agency as the beneficiary--can be established so that it will satisfy future Federal permit requirements for the facility. This should result in savings for the facilities because it avoids having both a Federal and a State financial instrument for the same facility.

For details, please refer to the following regulations: Ohio EPA requirements--Ohio Administrative Code Rule 3745 for closure, post-closure, liability, and instrument wording; Federal Permit requirements--Resource Conservation and Recovery Act (RCRA) as amended, Section 3004 (42 USC §6924), Title 40 of the Code of Federal Regulations (40 CFR §264.149); State authorization requirements--RCRA Section 3006 (42 USC §6926).



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149



Richard F. Celeste  
Governor

CERTIFIED MAIL

October 15, 1987

Re: CLOSURE PLAN  
PREMIX, INC.  
OHD004200044, 02-04-0567

Ms. Debra Parshall-Hall  
Premix, Inc.  
P.O. Box 281  
North Kingsville, Ohio 44068

Dear Ms. Parshall-Hall:

On March 6, 1987, Premix, Inc. submitted to Ohio EPA a closure plan for a hazardous waste drum storage area located at Route 20 and Harmon Road, Harmon, Ohio. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Premix's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of Premix, Inc. in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at Premix, Inc. meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by Premix, Inc. is hereby approved with the following modifications:

1. Soil samples collected in the area designated in the plan to be closed shall be collected using the appropriate representative sampling method found in 40 CFR 261 Appendix I.
2. Soil samples shall be initially collected to a minimum depth of 1 foot below the crushed limestone/soil interface; samples shall be analyzed in individual 6 inch increments.
3. Soil samples shall be handled and analyzed (for organic contaminants) using Method 8240 and Method 8250 found in USEPA Publication SW-846, "Test Methods for Evaluating Solid Wastes." At a minimum, Premix shall analyze

I certify this to be a true and accurate copy of the  
official document as filed in the records of the Ohio  
Environmental Protection Agency.

By: Mary Carr Date 10-15-87

Ohio Environmental Protection Agency  
ENTERED DIRECTOR'S JOURNAL

OCT 15 1987



October 15, 1987

samples for the presence of methylene chloride, acetone, toluene, pyridine, methanol, chloroform and styrene. Analyses for the other compounds detected by those methods shall also be conducted and reported.

4. Soils in the area undergoing closure shall be considered contaminated if soil samples contain greater than the analytical detection limit of any RCRA waste solvent. Analytical detection limits shall be taken from the appropriate methods in USEPA Publication SW-846, "Test Methods for Evaluating Solid Wastes."
5. If styrene is detected in the soil samples, Premix shall demonstrate to Ohio EPA that the presence of this compound does not present a risk to human health or the environment.
6. Premix shall continue to remove contaminated soils from the closure area until subsequent soil testing, both laterally and vertically, demonstrates that no contamination by organic compounds remains. Premix shall manage contaminated limestone gravel and soil as hazardous waste.
7. Equipment used to collect samples and to remove contaminated gravel and soil shall be adequately decontaminated following use, by washing with an appropriate cleaner and then triple-rinsing. No more than 1 mg/liter of any RCRA regulated waste solvent shall remain in the final (3rd) rinseate in order for the equipment to be considered decontaminated. Rinseates shall be analyzed using methods found in USEPA Publication SW-846, "Test Methods for Evaluating Solid Wastes." Washwaters and rinsewaters containing greater than 1 mg/liter of any RCRA regulated waste solvent shall be managed as hazardous waste. Samples shall be analyzed for the same parameters using the same analytical methods as specified in Modification #3.
8. Premix shall submit all closure analytical results to Ohio EPA Northeast District Office (NEDO) and Central Office (CO) within ten (10) working days of receipt by Premix. Premix shall also submit, at that time, evidence of a laboratory QA/QC program.
9. Prior to initiating these closure activities, Premix shall notify and receive approval from Ohio EPA NEDO of the facility's chosen soil sampling method, procedures for removing contaminated soil, and method for containment of generated washwaters/rinsewaters. Premix shall notify the Ohio EPA NEDO at least ten (10) working days in advance of the initiation of closure activities.

Please be advised that approval of this closure plan does not release Premix, Inc. from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carrin Date 10-15-87

Ohio Environmental Protection Agency  
ENTERED DIRECTOR'S JOURNAL

OCT 15 1987

Ms. Debra Parshall-Hall  
Page Three  
October 15, 1987

Premix shall notify the Ohio EPA Northeast District Office (NEDO) at least ten (10) working days in advance of the initiation of closure activities.

Due to the fact that the Ohio EPA is not currently authorized to conduct the federal hazardous waste program in Ohio, your closure plan also must be reviewed and approved by USEPA. Federal RCRA closure regulations (40 CFR 265.112) require that you submit a closure plan to George Hamper, Chief, Waste Management Division, Technical Programs Section, Ohio Unit, USEPA, Region V, 5HS-13, 230 South Dearborn Street, Chicago, Illinois 60604. Approval by both agencies is necessary prior to commencement of activities required by the approved closure plan.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,



Richard L. Shank, Ph.D.  
Director

RLS/DF/ara

cc: Thomas Crepeau/DSHWM Central File, Ohio EPA  
Rebecca Strom, USEPA, Region V  
Deborah Berg, NEDO, Ohio EPA

1370U

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

ENTERED DIRECTOR'S JOURNAL

By Mary Caven Date 10-15-87

OCT 15 1987



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149



Richard F. Celeste  
Governor

CERTIFIED MAIL

April 18, 1988

Re: CLOSURE PLAN  
PREMIX INC.  
OHD004200044, 02-04-0567

Ms. Debra Parshall-Hall  
Premix Inc.  
Route 20 and Harmon Road  
North Kingsville, Ohio 44068

Dear Ms. Parshall-Hall:

On December 22, 1987, Premix Inc. submitted to Ohio EPA a closure plan for a concrete container storage pad located at Route 20 and Harmon Road, North Kingsville, Ohio. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Premix Inc.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of Premix Inc. in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal, I conclude that the closure plan for the hazardous waste facility at Premix Inc. meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by Premix Inc. is hereby approved with the following modifications:

1. The drum storage area shall be swept and the sweepings shall be managed as hazardous waste.
2. Subsequently, the drum storage area shall be power rinsed with water and the rinseate collected and tested for volatile organics, solvents, and paint wastes. The rinseate shall be analyzed using methods found in USEPA publication SW-846, "Test Methods for Evaluating Solid Wastes." At a minimum, Premix Inc. shall analyze for methylene chloride, acetone, toluene, and pyridine (SW-846 Methods 8240 & 8250); methyl isobutyl ketone and methyl ethyl ketone (SW-846 Method 8015); lead and chromium (SW-846 Methods). Analyses for other compounds detected in the organics testing shall be conducted and reported to further quantify wastes.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Nature Davis Date 4-18-88

Ohio Environmental Protection Agency  
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APR 18 1988

April 18, 1988

3. Both rinseates and the storage pad shall be considered contaminated if the rinseates contain greater than 1 mg/l of any RCRA regulated solvents or organics, or greater than the maximum concentrations of lead and chromium under the characteristic of EP Toxicity in OAC 3745-51-24. Contaminated rinseates (as defined above) shall be considered hazardous waste and disposed of accordingly. The pad shall be power rinsed with water until contamination is removed as defined above.
4. All equipment used in the decontamination of the storage pad must be power rinsed with water and the rinseate must be tested for volatile organic compounds, waste solvents, and paint wastes. Samples shall be analyzed and managed for the parameters using the same analytical methods as specified #2 and #3 above.
5. Prior to initiating these closure activities, Premix shall notify Teresa Sabol, Ohio EPA, Northeast District Office (NEDO), and receive approval from Ohio EPA, NEDO, of the facility's chosen sampling methods, and methods for containment of generated soils and washwaters/rinseates. Premix shall notify Teresa Sabol, Ohio EPA, NEDO, at least ten (10) business days in advance of the initiation of closure activities.
6. Premix shall submit all closure analytical results to Teresa Sabol, Ohio EPA, NEDO, within ten (10) business days of receipt by Premix. Premix shall also submit, at that time, evidence of laboratory QA/QC program ensuring that the equipment and methods used for analysis provided precise and accurate results for the SW-846 analyses performed.
7. The storage pad shall be checked for cracks. Should cracks be found, Premix must sample soils under the crack along its entire length. Sampling can be done by boring holes through the concrete (along the crack line) and taking soil samples using a split spoon sampler. Samples shall be taken in six (6) inch depth increments to a minimum depth of one (1) foot beneath the soil surface.
8. Soil samples shall be handled and analyzed for organic contaminants using Method 8015, Method 8240, and Method 8250 found in USEPA Publication SW-846, "Test Methods for Evaluating Solid Wastes." At a minimum, Premix shall analyze samples for the presence of methylene chloride, acetone, toluene, pyridine, methyl ethyl ketone and methyl isobutyl ketone. Analyses for lead and chromium must also be performed. The facility shall analyze soils for background levels of total metals in areas on site with similar geology (as those that are contaminated) that are not impacted by solid or hazardous waste operations. These background levels of lead and chromium shall then be compared to the levels of total lead and total chromium found in the soils underneath the storage pad. A minimum of four (4) background soil sample sites shall be selected with the approval of Teresa Sabol, Ohio EPA, NEDO.

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By: Natasha Davis Date 4-18-88

9. The soil shall be considered contaminated (and managed as hazardous waste) if soil samples contain greater than the analytical detection limit of any RCRA waste solvent (see SW-846) or with EP Toxic metals above the maximum concentrations specified in OAC 3745-51-24. Soils contaminated with metals at levels greater than background but less than EP toxic levels shall be managed as solid waste.
10. Premix shall continue to remove contaminated soils from underneath and around the storage pad until subsequent soil testing (both laterally and vertically) demonstrates that no contamination by organic compounds or metals remain in the soils.
11. On page 5, item #6, soil removal and backfilling are mentioned but they are not addressed in the closure plan. These proposed processes shall be expounded upon and submitted to Teresa Sabol, Ohio EPA, NEDO, at least ten (10) working days in advance of initiation of closure activities.
12. Premix Inc. shall provide a detailed drawing of the storage area to be closed to Teresa Sabol, Ohio EPA, NEDO, at least ten (10) business days in advance of initiation of closure activities. The extent of the diking shall be emphasized.
13. The owner/operator's and independent registered engineer's certification's of closure must follow the signature requirements found in OAC 3745-50-42 and the owner certification statements must include the exact wording found in OAC 3745-50-42(D).
14. Premix Inc. shall notify Teresa Sabol, Ohio EPA, NEDO, at least five (5) business days in advance of critical closure activities (i.e., soil sampling, pad cleaning and rinsing, soil removal, etc.) so that she can be present to observe these activities. Premix shall also ensure that the registered independent professional engineer will be present during crucial closure activities.

Please be advised that approval of this closure plan does not release Premix Inc. from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Due to the fact that the Ohio EPA is not currently authorized to conduct the federal hazardous waste program in Ohio, your closure plan also must be reviewed and approved by USEPA. Federal RCRA closure regulations (40 CFR 265.112) require that you submit a closure plan to George Hamper, Chief, Waste Management Division, Technical Programs Section, Ohio Unit, USEPA, Region V, 5HS-13, 230 South Dearborn Street, Chicago, Illinois 60604. Approval by both agencies is necessary prior to commencement of activities required by the approved closure plan. If closure activities will, of necessity, take longer than 180 days to complete in order to allow for a period of time for review

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Nature Davis Date 4-18-88

Ohio Environmental Protection Agency  
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Ms. Debra Parshall-Hall  
Page Four  
April 18, 1988

and approval by USEPA, a longer closure period is hereby approved pursuant to OAC rule 3745-66-13(B) provided Premix Inc. shall commence closure upon receipt of this approval by Ohio EPA or upon receipt of approval by USEPA, whichever occurs later. The closure period shall not exceed 180 days beyond the latter approval.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Richard L. Shank, Director, Ohio Environmental Protection Agency, Attn: Thomas Crepeau, Program Planning and Management Section, Division of Solid and Hazardous Waste Management, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,



Richard L. Shank, Ph.D.  
Director

RLS/PV/ara

cc: Thomas Crepeau/DSHWM Central File, Ohio EPA  
Rebecca Strom, USEPA, Region V  
Teresa Sabol, NEDO, Ohio EPA  
Dave Wertz, NEDO, Ohio EPA  
Paul Vandermeer, DSHWM, Ohio EPA

1370U

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Natice Davis Date 4-18-88

Ohio Environmental Protection Agency  
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APR 18 1988

# PREMIX, INC.

P. O. BOX 281

NORTH KINGSVILLE, OHIO 44068

PHONE (216) 224-2181

February 26, 1987

Mr. Tom Crepeau  
Data Management Unit  
OHIO EPA  
Division of Solid and Hazardous Waste Management  
P. O. Box 1049  
Columbus, OH 43266-1049

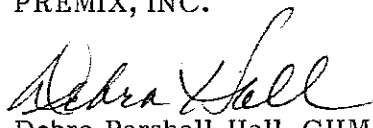
Dear Mr. Crepeau:

Attached is a request for partial closure of a waste management unit, OAC 3745-66-12(C) for the Premix, Inc., North Kingsville facility, EPA I.D. #OHD 004200044, Permit No. 02-04-0567.

Please review and comment.

Sincerely,

PREMIX, INC.

  
Debra Parshall-Hall, CHMM  
Environment Engineer

bw

Attachment

✓ cc: Mr. George Hamper, 5HS-13  
Ohio Permit Unit  
U.S. EPA Region V  
230 South Dearborn Street  
Chicago, IL 60404

Ms. Deborah J. Berg  
Ohio EPA  
Northeast District Office  
Twinsburg, OH 44087-1969

Mr. F. M. Davey  
Mr. M. Fickenscher  
Premix, Inc.

REQUEST FOR PARTIAL CLOSURE

Premix, Inc.

N. Kingsville, Ohio 44068

February 26, 1987



## Index

### Page

1	Description of Facility (OAC 3745-66-12)
2	Description of Waste Management Unit to be Closed
3	Map of Facility
4	Detailed Drawing of Unit to be Closed
5	List of Hazardous Waste (OAC 3745-66-12)
6	Schedule of Closure (OAC 3745-66-13) (A)
7	Air Emissions (OAC 3745-66-11)
8	Personnel Safety and Fire Prevention (OAC 3745-66-11)
9	Decontamination Efforts (OAC 3745-66-14)
10	"Clean" Levels for Soil (OAC 3745-66-11)

DESCRIPTION OF FACILITY  
(40 CFR 265.112 and OAC 3745-66-12)

Request for: Partial Closure for Purposes of Drum Storage Upgrade Plan

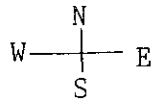
- Premix, Inc.  
Route 20 and Harmon Road  
North Kingsville, Ohio 44068
- SIC 30-79: Manufacturer of reinforced thermoset molding compounds
- Products manufactured: molding compounds and custom molded fiberglass parts.
- Employees: 500 persons

## DESCRIPTION OF WASTE MANAGEMENT UNIT TO BE CLOSED

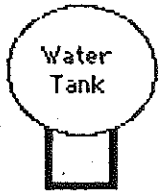
Partial Closure of S01 Storage Consisting of:

1. Waste Resin Solution, D001 (Not Listed on Part A Permit)
  2. Waste Combustible Liquid, F002, F003, F005 (Line 1, Part A)
  3. Waste Paint Related Materials, D001 (Line 3, Part A)
- Period of Use: November 8, 1980 to July, 1982
  - Dimension of Area: 15' wide x 30' long
  - Soil: Analysis Performed 3-21-79 Found 0.0.7' crushed limestone; 0.7' to 14' brown coarse to fine sand, some gravel. Trace silt, loose, moist. Sample performed by Herron Testing Lab, using a Model B-61 rotary mobile drill rig. Hollow tube flight augers 7.0" O.D. x 2.75 I.D., ASTM D-1586-67.





Hazardous Waste Storage Area



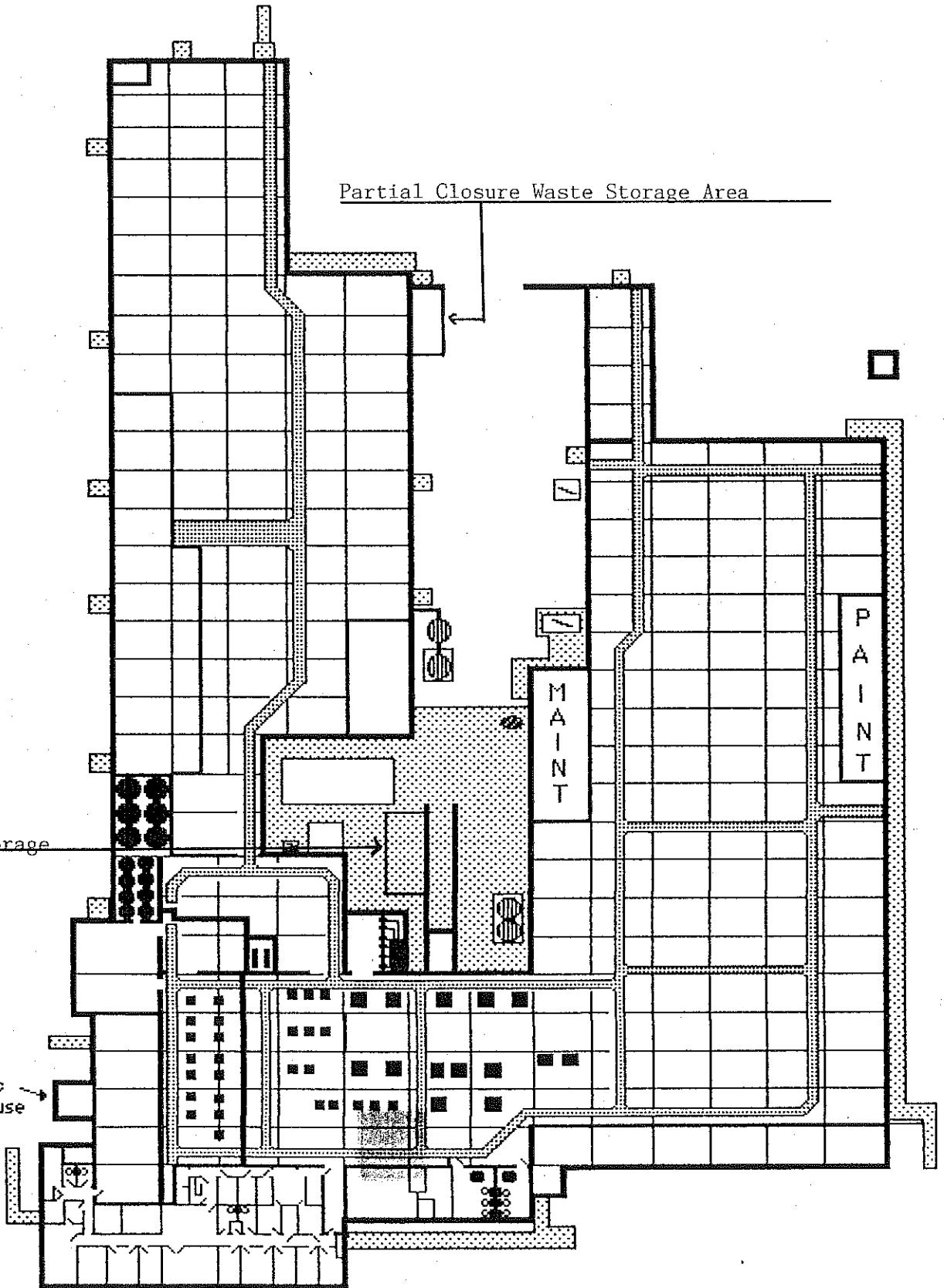
Water  
Tank

Diesel Pump  
House

Partial Closure Waste Storage Area

Current Waste Storage

Electric  
Pump House



LIST OF HAZARDOUS WASTE  
(40 CFR 265.112 and OAC 3745-66-22)

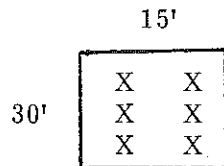
SO1 Storage:

1. Waste Resin Solution  
Flammable Liquid UN1866, D001  
20 - 40 drums
2. Waste Combustible Liquid Nos.  
Combustible Liquid, NA 1993  
F002, F003, F005  
80 - 100 drums
3. Waste Paint Related Materials  
Flammable Liquid UN1263, D001  
10 - 20 drums

SCHEDULE OF CLOSURE  
(40 CFR 265.113 [1] and OAC 3745-66-13 [A])

Waste has not been stored at Partial Closure Site since July 1982. Waste is currently stored at location noted on map.

Sample analysis will be performed in the following manner:



1 sample for every 75 square ft.

Two samples will also be performed at a predetermined clean site to determine how clean is clean regarding partial storage closure sample.

(40 CFR 265.113 [2] and OAC 3745-66-13[B])

Closure Timetable:

1. Waste Removal: Completed July 1982
2. Sampling: Will be done within 30 days of Directors approval of Partial Closure Plan.
3. Soil Removal: Will be done within 30 days of receiving sample results.
4. Independent Engineer Present: Within 30 days of soil removal.
5. Backfilling, if needed: Within 30 days of Independent's Engineer's Certification.



AIR EMISSIONS  
(40 CFG 265.111 and OAC 3745-66-11)

Not applicable.

## PERSONNEL SAFETY AND FIRE PREVENTION

(40 CRF 265.111 and OAC 3745-66-11)

The procedure of sampling, soil removal, or backfilling will not present any fire hazard for residents, employees or contractors. Once sampling results have been achieved, a decision will be made on any protective clothing or respiratory protection that will be needed. No employee or contractor will work at the site unless trained on the hazardous constituents that are involved.

No resident will be allowed on the premises.

If Personnel decontamination needs to be done according to sample results or due to personnel being contaminated during working at the site, total decontamination will be done:

1. Remove all clothing.
2. Use emergency shower.
3. Do not reuse clothing until it has been washed.

## DECONTAMINATION EFFORTS

(40 CFR 265.114 and OAC 3745-66-14)

There is not any contamination that could be present that affects anything else but the soil. No tanks, paved areas, concrete, pipes, pumps, or sumps or any other appurtenances at the waste management unit. See Page 10.



"CLEAN" LEVELS FOR SOIL  
(40 CFR 265.111 and OAC 3745-66-11)

Alternative A will be used for soil analysis to determine "clean" levels.  
See page 6.

Request For Closure

Of Hazardous Waste Storage Unit

40 CFR 265.112 (C) + OAC 3745-66-12 (C)

Premix, Inc.

North Kingsville, Ohio 44068

## Index

* Description of Facility OAC 3745-66-12	Page 1
* Description of Waste Unit to be Closed OAC 3745-66-12 (1) (2)	Page 2
* Detailed Drawings of Unit to be Closed OAC 3745-66-12 (1)	Page 4
* Description of Final Closure OAC 3745-66-12 (A) (B) OAC 3745-66-12 (1)	Page 5
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* Decontamination/Disposal OAC-3745-66-14	Page 7
* Certification of Closure OAC-3745-66-15	Page 8
* Map of Facility (attachment) OAC-3745-66-12 (1)	



Description of Facility  
(40 CFR 265.112 and OAC 3745-66-12)

Request For: Total Closure Of Hazardous Waste Storage Unit

Premix, Inc.  
Route 20 & Harmon Road  
North Kingsville, Ohio 44068  
EPA ID Number: OHD004200044  
Sic 30-79: Manufacturer of reinforced Thermoset Molding Compounds  
and custom molded parts

Employees: 500 persons

Area: Residential/Farm  
Latitude 42° 00<sup>1</sup> Longitude 80° 00<sup>1</sup>

Description of Waste Unit to be Closed  
40 CFR 265.112 (3) and OAC-3745-66-12 (1) (2)

The waste storage area is a concrete pad, consisting of approximately 910 square feet and partially diked. S01 storage is limited to two hundred and ten barrels, under Permit Number 02-04-0567.

In reference to Permit Application Part A, Form 3 RCRA, the following wastes were originally listed.

Line 1. F002, F003, F005 Solvent Blend, SP-21 (methylene chloride, toluene, acetone)

Line 3. D001, paint residues

Waste not listed on Part A Permit:

A. Waste Resin Solution, D001

B. Waste Pyridine, U196

C. Waste Acetone, U002

D. Waste Alcohol, D001

E. Waste 731 (D001)

F. Waste Solvent (replaces SP-21) Effective March 1987 - F002, F003, F005, 1-1-1 Trichloroethane, Acetone, Toluol, Trichlorotrifluoroethane.

\* This storage area originated in August of 1982 and has been continually in use to date.

Estimated maximum inventory of hazardous waste ever on site over the active life of storage unit was one hundred and sixty, S01 containers.

Methods to be used prior to and including closure:

Disposal dates will be arranged prior to closure with licensed TSDF's for removal of hazardous waste. Removal of waste from storage unit to shipping prior to transportation will be done by a persons trained in hazardous waste operations.

Transportation of hazardous wastes will be done by the specific disposal facility approved for incineration/reclamation/land disposal of hazardous waste.

The following waste streams will be disposed of by Ross Incineration, 394 Giles Rd., Grafton, OH.

1. Waste Pyridine (U196)
2. Waste Solvent Solids (F002, F003, F005)
3. Waste Paint (D001)

Chemical Solvents, Inc., 3751 Jennings Rd., Cleveland, OH will remove and dispose of:

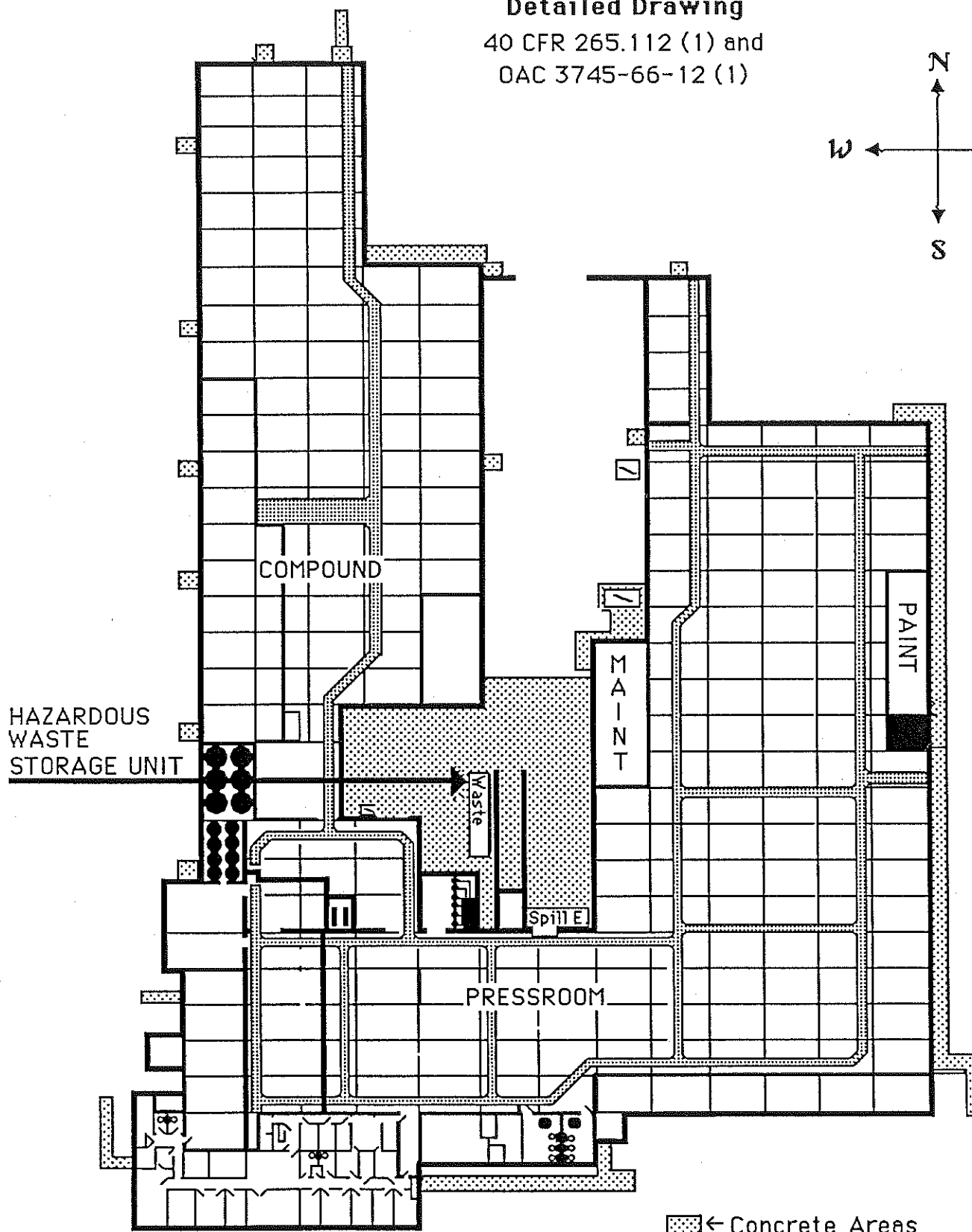
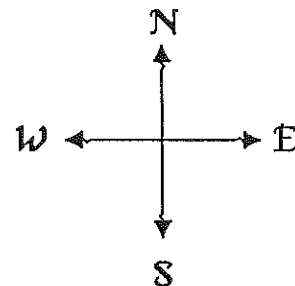
1. Waste Solvent Liquid (F002, F003, F005)
2. Waste Acetone (U002)
3. Waste Solvent (D001)
4. Waste Solvent SP-731 Solids, (D001)

Northeast Chemical, 3301 Monroe Ave., Cleveland, OH will remove and dispose of the remaining waste stream.

1. Waste Resin (D001)

***PREMIX, INC.*** North Kingsville OH.  
Hazardous Waste Storage Unit

Detailed Drawing  
40 CFR 265.112 (1) and  
OAC 3745-66-12 (1)





Description of Final Closure  
40 CFR 265.112 (2), 40 CFR 265.111 (a) (b) (c)  
OAC 3745-66-11 (A) (B), OAC 3745-66-12 (1)

1. The facility will be closed in a manner that minimizes the need for further maintenance, controls, and eliminates to the maximum extent necessary to protect human health and the environment.
2. The closure will be conducted by trained professionals. Scrapping and sampling of storage area will be performed.
3. Clean levels for soil are not applicable as storage area is concreted and diked.
4. Contamination of water and soil will be prevented by staying in the concreted area that is to be closed.
5. Air emissions will be monitored, by trained individuals, during the course of the closure if any hazardous chemicals or hazardous substances are used for waste removal off the concreted area.
6. The procedure of sampling, soil removal, backfilling will not present any fire hazard for residents, employees or contractors. Once sampling results have been achieved, a decision will be made on any protective clothing or respiratory protection that will be needed. No employee or contractor will work at the site unless trained on the hazardous constituents that are involved.

No resident will be allowed on the premises.

If Personnel decontamination needs to be done according to sample results or due to personnel being contaminated during working at the site, total decontamination will be done:

1. Remove all clothing.
  2. Use emergency shower.
  3. Do not reuse clothing until it has been washed.
7. Facility will remain "active" during the closure operation. Waste being accumulated during this time will be transported prior to storage.

After closure is completed, and certified according to all applicable regulations, the storage unit will be utilized as a less than ninety day accumulation area.

Schedule of Closure  
OAC 3745-66-13 (A and B)  
and 40 CFR 265.113 (a thru b)

Within ninety day after receiving approval of the approved closure plan, all waste will be removed from the closure unit and disposed of off-site at licensed TSDF's, in accordance with the approved closure plan.

Within one hundred and eighty days of waste removal disposal, final closure activities will be completed in accordance with the approved closure plan.

Disposal/Decontamination  
(40 CFR 265.114 and OAC 3745-66-14)

1. During final closure period, all contaminated equipment or structures will be properly decontaminated or disposed of.
2. Any equipment used to collect samples and to remove contaminants shall be adequately decontaminated following use, by washing with an appropriate cleaner and thru triple rinsing.
3. Any waste generated by decontamination will be analyzed and then incinerated at a licensed TSDF.

Certification of Closure  
(OAC 3745-66-15)

Within sixty days of completion of closure, a certification of closure will be submitted, by registered mail to the Regional Administrator.

The certification will be signed by the owner/operator and by the Independent registered professional engineer, who documented the closure.

dgl  
12/14/87



SOIL BORING OPERATIONS  
AND LABORATORY TESTING OPERATIONS

WASTE STORAGE AREA

PREMIX, INC.

NORTH KINGSVILLE, OHIO



**Professional Service Industries, Inc.**  
Pittsburgh Testing Lab./Herron Consultants Div.



**Professional Service Industries, Inc.**  
Pittsburgh Testing/Herron Consultants Division

February 8, 1988

Premix, Inc.

P. O. Box 281

North Kingsville, Ohio 44068

Attention: Ms. Debra Parshall-Hall

Re: Soil Boring Operations and  
Laboratory Testing Operations  
Waste Storage Area  
North Kingsville, Ohio  
PSI File Number: 142-75175

Dear Ms. Hall:

This report summarizes the performance and results of soil boring operations and laboratory testing operations conducted at Premix, Inc.'s existing facilities located at Route 20 and Harmon Road in North Kingsville, Ohio. The investigation was verbally authorized by Ms. Debra Parshall-Hall and confirmed per Premix, Inc.'s P. O. #80367.

Per the request of Ms. Debra Parshall-Hall, a series of six (6) test borings was conducted within a former waste storage area at the Premix facilities on December 18, 1987. The test boring locations were selected and field located by Premix, Inc. A boring location plan is currently unavailable.

All test borings were carried to depths ranging between about three (3) and 4.5 feet below the existing site grades by means of rotary drive

drilling procedures employing hollow stem continuous flight augers. To avoid cross contamination, all auger and sampling equipment was steam cleaned prior to the initiation of the drilling operations and washed with detergent solution (Alconox) and clean water rinse between the individual test locations.

During the drilling operations, variations of the site's subsurface materials and groundwater conditions were recorded and continuous samples of the existing materials taken at regular intervals by means of a two (2)-inch o.d. split-spoon sampling device, driven by a 140 pound hammer, free falling through a distance of thirty (30) inches. During the course of sampling operations, the number of hammer blows required to achieve eighteen (18) inches of sample spoon penetration, was noted and recorded for each six-inch increment. These blow counts are shown on the accompanying Test Boring Logs.

No groundwater seepage was evidenced during or at the completion of the drilling operations. It should be recognized that the permeability of soils, seasonal variations, temperature and recent rainfall conditions may influence water levels at other times.

Sample materials obtained as a result of field sampling operations were visually classified and placed in properly-identified sealed glass sample jars. Subsequently, all samples were transported to PSI's Cleveland soil mechanics laboratory for analysis.

In the laboratory, all samples of materials derived from the drilling operations were classified in substantial accordance with the requirements of the American Society for Testing and Materials' standard method designation D-2488, "Description of Soils (Visual-Manual Procedure)" and identified employing the terminology and group symbols of the Unified

Soil Classification System (ASTM D-2487). The results of visual-manual classification operations, together with data developed during the field drilling operations, are included on the accompanying Test Boring Logs. The stratification lines noted on the boring logs represent approximate boundaries between the soil types, and the transitions may be gradual or abrupt.

In addition to classifying the materials, a composite soil sample from each test boring location was sent to Aqua Tech Environment Consultants, and analyzed for the presence of Methylene Chloride, Acetone, Toluene, Pyridine, Methanol, Chloroform and Styrene using method 8240 of EPA publication SW-846. These test results are included in the accompanying table.

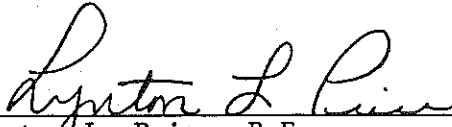
This report is submitted as confidential property of our client. Any information pertaining to the report would only be released with the client's written approval.


We wish to thank you for the opportunity of working with you on this project and look forward to continued association in the future.

Should you have any questions, please feel free to contact us.

Very truly yours,

PROFESSIONAL SERVICE INDUSTRIES, INC.

  
Lynton L. Price, P.E.  
Project Engineer

  
Vijay K. Khosla, Ph.D., P.E.  
Division Manager

LLP/md  
2cc: Premix, Inc.

APPENDIX



LABORATORY TEST RESULTS

	<u>B-1</u> <u>Composite</u> <u>0.0-4.5</u>	<u>B-2</u> <u>Composite</u> <u>0.0-3.0</u>	<u>B-3</u> <u>Composite</u> <u>0.0-3.0</u>	<u>B-4</u> <u>Composite</u> <u>0.0-3.0</u>	<u>B-5</u> <u>Composite</u> <u>0.0-3.0</u>	<u>B-6</u> <u>Composite</u> <u>0.0-3.0</u>
Chloroform	<18.0	<18.0	<16.5	<15.6	<12.0	<16.8
Methylene Chloride	<30.0	<30.0	<27.5	<26.0	<20.0	<28.0
Toluene	<18.0	<18.0	<16.5	<15.6	<12.0	<16.8
Acetone	<30.0	<30.0	<27.5	<26.0	<20.0	<28.0
Pyridine	<60.0	<60.0	<55.0	<52.0	<40.0	<56.0
Styrene	<18.0	<18.0	<16.5	<15.6	<12.0	<16.8
Methanol	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0

All results with the exception of Methanol are expressed as ug/kg (PPB) dry weight

Methanol is expressed as mg/kg (PPM) dry weight

# RECORD OF SUBSURFACE EXPLORATION

Project Name: Premix, Inc. Date of Boring: December 18, 1987

Site: Waste Storage Area, North Kingsville, Ohio Project No.: 142-75175

DESCRIPTION	DEPTH	SAMPLE	Blow Count	$Q_u$	$Q_p$	$M_c$	REMARKS
<del>SURFACE</del>			15-				
Brown Silty Sand, Trace Gravel, Moist, Dense. (SM)		1SS	14-10				
		2SS	4-5-6				
Brown Silty Sand, Trace Gravel, Clay, Moist, Med. Dense. (SM)		3SS	1-4-4				
End of Boring - 4.5'	5						

# Professional Service Industries, Inc.

## RECORD OF SUBSURFACE EXPLORATION

Boring B-2

Project Name: Premix, Inc. Date of Boring: December 18, 1987

Site: Waste Storage Area, North Kingsville, Ohio Project No.: 142-75175

DESCRIPTION	DEPTH	SAMPLE	Flow Count	$q_u$	$q_p$	$M_c$	REMARKS
<u>SURFACE</u>							
Brn. Silty Sand, Some Gravel, Moist, Med. Dense. (SM)		1SS	4-5- 10				
*		2SS	4-5-7				
End of Boring - 3.0'	5						
*Brn. Silty Sand, Some Gravel, Clay, Moist, Med. Dense. (SM)							



## RECORD OF SUBSURFACE EXPLORATION

Site: Waste Storage Area, North Kingsville, Ohio Project No.: 142-75175

DESCRIPTION	DEPTH	SAMPLE	Blow Count	Q <sub>u</sub>	Q <sub>p</sub>	M <sub>c</sub>	REMARKS
SURFACE			12-8-7				
Brn. Silty Sand, Some Gravel, Trace Clay, Med.Dense, Moist. (SM)		1SS					
*		2SS	4-6-7				
End of Boring - 3.0'	5						
*Brown Silty Sand, Some Gravel, Some Clay, Med. Dense, Moist. (SM)							



# Professional Service Industries, Inc.

## RECORD OF SUBSURFACE EXPLORATION

Boring B-5

Project Name: Premix, Inc. Date of Boring: December 18, 1987

Site: Waste Storage Area, North Kingsville, Ohio Project No.: 142-75175

DESCRIPTION	DEPTH	SAMPLE	Blow Count	$q_u$	$q_p$	$M_c$	REMARKS
<del>SURFACE</del>							
Brown Silty Sand, Some Clay, Trace		1SS	8-9-8				
Gravel, Moist, Dense. (SM)		2SS	4-4-4				
End of Boring - 3.0'	5						

# Professional Service Industries, Inc.

## RECORD OF SUBSURFACE EXPLORATION

Boring B-6

Project Name: Premix, Inc. Date of Boring: December 18, 1987

Site: Waste Storage Area, North Kingsville, Ohio Project No.: 142-75175


DESCRIPTION	DEPTH	SAMPLE	Blow Count	$q_u$	$q_p$	$M_c$	REMARKS
<del>SURFACE</del>							
Brown Silty Sand, Some Gravel, Moist, Dense. (SM)		1SS	12-8- 13				
*		2SS	8-9-7				
End of Boring - 3.0'	5						
*Brown Silty Clay, Some Gravel, Clay, Moist, Dense. (SM)							

## GENERAL NOTES

SAMPLE IDENTIFICATION

The Unified Soil Classification System is used to identify the soil unless otherwise noted.

SOIL PROPERTY SYMBOLS

- N: Standard "N" penetration: Blows per foot of a 140 pound hammer falling 30 inches on a 2 inch O.D. split-spoon.
- Qu: Unconfined compressive strength, TSF
- Qp: Penetrometer value, unconfined compressive strength, TSF
- Mc: Water content, %
- LL: Liquid limit, %
- PI: Plasticity Index, %
- $\delta_d$ : Natural dry density, PCF
- : Apparent groundwater level at time noted after completion.

DRILLING AND SAMPLING SYMBOLS

- SS: Split-Spoon - 1 3/8" I.D., 2" O.D., except where noted.
- ST: Shelby Tube - 3" O.D., except where noted.
- AU: Auger Sample.
- DB: Diamond Bit.
- CB: Carbide Bit.
- WS: Washed Sample.

RELATIVE DENSITY AND CONSISTENCY CLASSIFICATIONTERM (NON-COHESIVE SOILS)STANDARD PENETRATION RESISTANCE

Very Loose	0 - 2
Loose	2 - 4
Slightly Compact	4 - 8
Medium Dense	8 - 16
Dense	16 - 26
Very Dense	Over 26

TERM (COHESIVE SOILS)Qu - (TSF)

Very Soft	0 - 0.25
Soft	0.25 - 0.50
Firm (Medium)	0.50 - 1.00
Stiff	1.00 - 2.00
Very Stiff	2.00 - 4.00
Hard	4.00 +

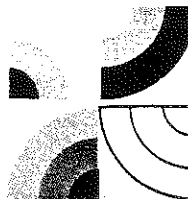
PARTICLE SIZE

Boulders	8 in. +	Coarse Sand	5mm-0.6mm	Silt	0.074mm-0.005mm
Cobbles	8 in.-3 in.	Medium Sand	0.6mm-0.2mm	Clay	-0.005mm
Gravel	3 in.-5mm	Fine Sand	0.2mm-0.074mm		

RICHARD WOHLER Ph. D.  
LABORATORY DIRECTOR

# FREE-COL LABORATORIES

DIVISION OF FREEPORT BRICK COMPANY  
P.O. BOX 557, COTTON ROAD  
MEADVILLE, PENNSYLVANIA 16335  
PHONE: (814) 724-6242



TO: Premix Incorporated  
Box 281  
North Kingsville, OH 44068  
  
ATTN: Debbi Hall

DATE SAMPLE(S) RECEIVED 7/18/85/054

P.O.#: 68310

## ANALYTICAL REPORT FORM

Parameter

Sample

Flammability

See Note Below

Note: The sample would not ignite in 5 seconds or less; therefore it is not considered flammable.

Parameter

Leachate

Styrene Monomer mg/L

0.628

"The Leachate was prepared in accordance with the E.P. Toxicity Test Methods described in the May 19, 1980 Federal Register."

8/6/85

/mh

A I.H.A Accreditation No. 98  
W/CLIA Lic. No. 37-1129

WV E.P.A. Certification No. 21-R  
OH E.P.A. Approval No. 01060 & 970

*Debi R. Ferguson*  
ADMINISTRATIVE ASSISTANT

PA. Department of Health  
Clinical Laboratory Permit No. 561  
E.P.A. Facility No. 38-073

KEY:

< = LESS THAN

> = GREATER THAN

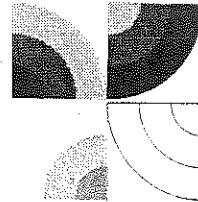
w.f. = WILL FOLLOW

# FREE-COL LABORATORIES, INC.

P.O. BOX 557, COTTON ROAD  
MEADVILLE, PENNSYLVANIA 16335  
PHONE: (814) 724-6242  
FAX: (814) 333-1466

07/31/89

HARD WOHLER, Ph.D.  
LABORATORY DIRECTOR



TO:

PREMIX INCORPORATED  
ATTN: MR. MARK MITCHAM  
P.O. BOX 281  
NORTH KINGSVILLE

OH 44068-0281

P.O. #M89320

ACCOUNT NO. 00354

## ANALYTICAL REPORT FORM

SAMPLE ID		1	2	3	4
PARAMETER	LAB ID	90728052	90728053	90728054	90728055
	DATE RECEIVED:	07/28/89	07/28/89	07/28/89	07/28/89
STYRENE	MG/L	<0.002	<0.002	<0.002	<0.002
VOLATILE SET-UP		X	X	X	X

*Dr. Tracy*  
QA/QC Supervisor

LA Accreditation No. 98  
WCLIA Lic. No. 37-1129  
U.S. Public Health Services Approved Facility  
PA D.E.R. Laboratory I.D. No. 20-073  
PA Dept. of Health Cert. No. 000021  
PA Dept. of Agriculture Approved Dairy Laboratory

NY Dept. of Health Laboratory I.D. No. 10552  
NY Dept. of Env. Conservation Approved Facility  
MD Dept. of Health Cert. No. 130  
VA Dept. of Health Laboratory I.D. No. 00145  
WV Dept. of Health Certification No. 21-R  
NJ Dept. of Env. Protection Lab I.D. No. 77613

NC Dept. of Natural Resources Cert. No. 236  
SC Dept. of Health Laboratory I.D. No. 89004  
GA Dept. of Natural Resources Cert. No. 821  
MI Dept. of Public Health Approved Facility  
U.S. Office of Surface Mining Approved Facility

KEY:

< = LESS THAN

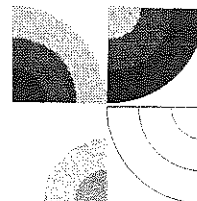
> = GREATER THAN

w.f. = WILL FOLLOW



FREE-COL LABORATORIES, INC.

P.O. BOX 557, COTTON ROAD  
MEADVILLE, PENNSYLVANIA 16335  
PHONE: (814) 724-6242  
FAX: (814) 333-1466



07/31/89

TO:

PREMIX INCORPORATED

P.O. # 89327

ATTN: MR. MARK MITCHAM *Brenda Ritchie*

P.O. BOX 281

NORTH KINGSVILLE

OH 44068-0281

ACCOUNT NO. M00354

ANALYTICAL REPORT FORM

SAMPLE ID : BLANK

LAB ID 90728056

DATE RECEIVED: 07/28/89

PARAMETER

STYRENE MG/L

0.031

VOLATILE SET-UP

X

*DA Tracy*  
*QA/QC Supervisor*

PA. Accreditation No. 98  
PA. CLIA Lic. No. 37-1129  
U.S. Public Health Services Approved Facility  
PA D.E.R. Laboratory I.D. No. 20-073  
PA Dept. of Health Cert. No. 000021  
PA Dept. of Agriculture Approved Dairy Laboratory

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GA Dept. of Natural Resources Cert. No. 821  
MI Dept. of Public Health Approved Facility  
U.S. Office of Surface Mining Approved Facility

KEY:

< = LESS THAN

> = GREATER THAN

w.f. = WILL FOLLOW

AmeriTrust Company  
900 Euclid Avenue  
Cleveland, Ohio  
(216) 687-5680

International Division  
CABLE ADDRESS  
"AMERITRUST"

DAT JULY 1, 1983

**AmeriTrust**

**IMPORT DOCUMENTARY SERVICES**

<b>YOUR REF.</b>	<b>DATED</b>	<b>OUR REF</b> SB 21401	<b>DATED</b> JULY 1, 1983
<b>NAME:</b>		<b>BENEFICIARY:</b> ENVIRONMENTAL PROTECTION AGENCY REGION V, 230 DEARBORN STREET CHICAGO, ILLINOIS 60604 ATTN: CHARLES B. SLARSTASA <b>APPLICANT:</b> PREMIX, INC. <i>OKD 00420044</i>	
<b>AMOUNT:</b>	\$12,000.00		

**\*\*PLEASE BE GUIDED BY THE FOLLOWING CLAUSES MARKED BELOW\*\***

- ( X ) Enclosed please find the original Letter of Credit. Please examine the contents carefully. In the event that you are unable to comply with its terms, you should contact the Applicant (stated above) directly and request that amended instructions be issued.
- ( ) Enclosed please find Amendment NO. \_\_\_\_\_ which forms an integral part of the above referenced Letter of Credit.
- ( ) Enclosed please find a copy of the Letter of Credit referenced above to be retained for your files. The original Letter of Credit has been forwarded directly to the Beneficiary (stated above).
- ( ) Enclosed please find a copy of Amendment NO. \_\_\_\_\_. Kindly retain this copy for your files.
- ( ) Amendment NO. \_\_\_\_\_ has been forwarded directly to the Beneficiary. Enclosed is a copy to be retained for your files.
- ( ) Copy of telex opening enclosed. Kindly retain for your files.
- ( ) The Applicant has requested that the above referenced Credit be cancelled in its entirety. Kindly advise us the Beneficiary's consent to cancellation.
- ( ) The Applicant has requested the above referenced Credit be cancelled in its entirety. Kindly confirm your consent to cancellation and return the original Letter of Credit direct to our International Department at the earliest.
- ( ) Please note \_\_\_\_\_ charges are for the account of the Beneficiary. Kindly remit \_\_\_\_\_ representing our \_\_\_\_\_ charge.
- ( ) Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*Elba M. Davis*  
SIGNATURE

**HAZARDOUS WASTE FACILITY CERTIFICATE  
OF POLLUTION LIABILITY INSURANCE**

1. Liberty Mutual Insurance Company (the "Insurer"), of 175 Berkeley Street, Boston, Massachusetts 02117, hereby certifies that it has issued pollution liability insurance covering bodily injury and property damage to:

(Name of Insured) Premix Inc. (the "insured"),

(Address) P.O. Box 281, North Kingsville, OH 44068

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

(Name and Address of Each Facility)

(EPA Identification Number)

Premix Inc.  
Harman Rd. Rt. 20  
North Kingsville, OH 44068

OHD004200044

for ☒ sudden accidental occurrences,  
☐ sudden and nonsudden accidental occurrences.

The limits of liability are: \$ 2,000,000 annual aggregate  
\$ 1,000,000 each occurrence  
exclusive of legal defense costs.

The coverage is provided under policy number LG1-181-026682-052  
issued on (date) 10-1-82  
The effective date of said policy is (date) 10-1-82  
The effective date of said pollution coverage is (date) 6-20-83

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
- (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the Facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

F. R. Wilson

(Signature of authorized representative of Insurer)

F.R. Wilson, Business Policy Production Manager

(Type Name and Title) Authorized Representative of (Liberty Mutual Insurance Co.)

2501 Wilmington Rd., New Castle PA 16105

(Address of Representative)

AmeriTrust Company  
P.O. Box 5937  
Cleveland, Ohio 44101  
(216) 687-5687

International Division  
Cable Address  
"AmeriTrust"

DUPLICATE

DATE JULY 1, 1983

**AmeriTrust**

THIS CREDIT IS FORWARDED TO THE ADVISING BANK BY AIRMAIL  
THIS CREDIT IS CONFIRMATION OF OUR CABLE/TELEX OF TODAY

ADVISING BANK:

APPLICANT: PREMIX, INC.

P.O. BOX 281

NORTH KINGSVILLE, OHIO 44068

ATTN: L.E. PERKEY

BENEFICIARY: ENVIRONMENTAL PROTECTION AGENCY  
REGION V, 230 DEARBORN STREET  
CHICAGO, ILLINOIS 60604  
ATTN: CHARLES B. SLARSTASA  
TECHNICAL PERMITS & COMPLIANCE SECTION

AMOUNT: \$12,000.00 (TWELVE THOUSAND U.S.  
DOLLARS AND NO/100)

EXPIRY DATE: SEE BELOW\*\*

DEAR SIRS:

WE HEREBY ISSUE THIS IRREVOCABLE DOCUMENTARY LETTER OF CREDIT NO. SB 21401 WHICH IS  
AVAILABLE BY BENEFICIARY'S DRAFT(S) AT SIGHT DRAWN ON THE AMERITRUST COMPANY

ACCOMPANIED BY THE FOLLOWING DOCUMENTS:

SIGNED STATEMENT READING AS FOLLOWS: "I CERTIFY THAT THE AMOUNT OF THE DRAFT IS PAYABLE PURSUANT  
TO REGULATIONS ISSUED UNDER AUTHORITY OF THE RESOURCE CONSERVATION AND RECOVERY ACT OF 1976 AS  
AMENDED."

DRAFTS MUST DRAWN AND PRESENTED AT THIS OFFICE ON OR BEFORE JUNE 30, 1984.\*\*

SPECIAL CONDITIONS: THIS LETTER OF CREDIT IS EFFECTIVE AS OF JUNE 27, 1983 AND SHALL EXPIRE JUNE  
30, 1984, BUT SUCH EXPIRATION DATE SHALL BE AUTOMATICALLY EXTENDED FOR A PERIOD OF (AT LEAST 1  
YEAR) ON (DATE) AND ON EACH SUCCESSIVE EXPIRATION DATE, UNLESS, AT LEAST 120 DAYS BEFORE THE  
CURRENT EXPIRATION DATE, WE NOTIFY BOTH YOU AND PREMIX, INC. BY CERTIFIED MAIL THAT WE HAVE  
DECIDED NOT TO EXTEND THIS LETTER OF CREDIT BEYOND THE CURRENT EXPIRATION DATE. IN THE EVENT YOU  
ARE SO NOTIFIED, ANY UNUSED PORTION OF THE CREDIT SHALL BE AVAILABLE UPON PRESENTATION OF YOUR  
SIGHT DRAFT FOR 120 DAYS AFTER THE DATE OF RECEIPT BY BOTH YOU AND PREMIX, INC., AS SHOWN ON THE  
SIGNED RETURN RECEIPTS.

WHENEVER THIS LETTER OF CREDIT IS DRAWN ON UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS  
CREDIT, WE SHALL DULY HONOR SUCH DRAFT UPON PRESENTATION TO US, AND WE SHALL DEPOSIT THE AMOUNT  
OF THE DRAFT DIRECTLY INTO THE STANDBY TRUST FUND OF PREMIX, INC. IN ACCORDANCE WITH YOUR  
INSTRUCTIONS.

WE CERTIFY THAT THE WORDING OF THIS LETTER OF CREDIT IS IDENTICAL TO THE WORDING SPECIFIED IN  
9 CFR 264.151 (d) AS SUCH REGULATIONS WERE CONSTITUTED ON AUGUST 27, 1982.



AmeriTrust Company  
P.O. Box 5937  
Cleveland, Ohio 44101  
(216) 687-5687

International Division  
Cable Address  
"AmeriTrust"

DUPLICATE

PAGE TWO

**AmeriTrust**

THIS IS AN ATTACHMENT TO LETTER OF CREDIT NO. SB 21401 AND FORMS AND INTEGRAL PART THERETO.

L/C#: SB 21401  
F/O : ENVIRONMENTAL PROTECTION AGENCY  
A/C : PREMIX, INC.  
AMT : \$12,000.00  
EXP : JUNE 30, 1984

EACH DRAFT ACCOMPANYING DOCUMENTS MUST STATE DRAWN UNDER CREDIT NO. SB 21401 OF THE AMERITRUST COMPANY DATED JULY 1, 1983.

SPECIAL CONDITIONS: FORWARD ALL DOCUMENTS TO US IN ONE AIRMAILING.

ORIGINAL LETTER OF CREDIT MUST ACCOMPANY REQUIRED DOCUMENTS. NEGOTIATIONS ARE RESTRICTED TO THE COUNTERS OF THE AMERITRUST COMPANY CLEVELAND, OHIO.

WE HEREBY AGREE WITH THE DRAWERS, ENDORSERS AND BONA FIDE HOLDERS OF DRAFTS DRAWN AND NEGOTIATED UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS CREDIT THAT THE SAME SHALL BE DULY HONORED ON DUE PRESENTATION TO THE DRAWEE.

EXCEPT AS OTHERWISE EXPRESSLY STATED, THIS CREDIT IS SUBJECT TO THE "UNIFORM CUSTOMS AND PRACTICE FOR DOCUMENTARY CREDITS" (1974 REVISION) INTERNATIONAL CHAMBER OF COMMERCE, PUBLICATION NO. 290.

KINDLY ACKNOWLEDGE RECEIPT

  
AUTHORIZED SIGNATURE

EB10

# PREMIX, INC.

P. O. BOX 281

NORTH KINGSVILLE, OHIO 44068

PHONE (216) 224-2181

June 16, 1983

OHIO 004200044

Environmental Protection Agency  
Technical, Permits, & Compliance Section  
230 South Dearborn Street  
Chicago, Illinois 60604

Attn: Charles B. Slaustas

Subject: Your letter of 6 June 83 (copy enclosed)


Dear Mr. Slaustas:

In your letter you requested that I forward to you "either demonstrations of financial responsibility, or an estimated date when these demonstrations will be forwarded".

I have requested that our insurance carrier prepare and forward directly to you an appropriate Financial Guarantee Bond and a Certificate of Liability Insurance. I anticipate that these documents will be delivered to you on or before June 30, 1983.

Very truly yours,

PREMIX, INC.

  
L. E. Perkey  
Controller

/slm

RECEIVED  
JUN 20 1983

WASTE MANAGEMENT  
BRANCH



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
230 SOUTH DEARBORN ST  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

16 JUN 1983

5HW-13

Mr. Lowell Perkey  
Premix Inc.  
P.O. Box 281  
North Kingsville, Ohio 44068

RE: Financial Responsibility  
Requirements  
EPA ID No.: OHD 004 200 044

Dear Mr. Perkey:

In response to our telephone conversation on June 2, 1983, enclosed is a copy of a summary of Federal financial requirements for owners and operators of hazardous waste treatment, storage and disposal facilities. In addition, I am enclosing extracts of the applicable parts of Federal regulations pertaining to liability coverage requirements.

After reviewing these documents, please forward either demonstrations of financial responsibility, or an estimated date when these demonstrations will be forwarded, to this office.

Respectfully,

*Charles B. Slaustas*

Charles B. Slaustas  
Technical, Permits, and Compliance Section

16 JUN 1983

5HM-13

Mr. Lowell Perkey  
Premix Inc.  
P.O. Box 281  
North Kingsville, Ohio 44068

RE: Financial Responsibility  
Requirements  
EPA ID No.: OHD 004 200 044

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Respectfully,

Charles B. Slaustas  
Technical, Permits, and Compliance Section

INITIALS	DATE	TYPIST	AUTHORITY	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
P.S.	6/3/83		CB						



Certified  
P-456-027-903

MAY 31 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

SHW-13

Ms. Debbi Hall  
Premix Inc.  
Harmon Road and Route 20  
North Kingsville, Ohio 44068

Re: Premix Inc.  
EPA I.D. No. OED 004200044  
Harmon Road and Route 20  
North Kingsville, Ohio 44068

Dear Ms. Hall:

The above referenced facility is a hazardous waste treatment, storage, or disposal facility subject to the Resource Conservation and Recovery Act (RCRA) as amended. Federal regulations (40 CFR Part 265 Subpart H) require that such a facility shall provide to the United States Environmental Protection Agency (U.S. EPA) proof of financial assurance for closure by July 6, 1982, and liability coverage by July 15, 1982, (40 CFR 265.143 and 265.147 respectively).

To date U.S. EPA has not received these proofs; consequently, the facility is in violation of requirements of 40 CFR Part 265 Subpart H. The Agency considers these financial responsibility proofs as significant requirements of the hazardous waste regulations. Failure to provide these required proofs within 30 days of receipt of this notice may subject the facility to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation. Please forward the financial responsibility proofs to:

RCRA Activities  
Attn: Financial Requirements  
P.O. Box A3587  
Chicago, Illinois 60690

If you have any questions or desire additional information, please contact Mr. Charles B. Slaustas of my staff, at (312) 353-2474.

Sincerely,

William Miner, Chief  
Technical, Permits, and Compliance Section

cc: Deborah L. Tegtmeyer, OEPA

bcc: Thomas B. Golz, TPCS

CBS  
5/2/83  
WMM  
5/3/83



Ameritrust Company  
4366 Main Avenue  
P.O. Drawer B  
Ashtabula, Ohio 44004  
(216) 998-5191

William F. Hodgkiss  
Vice President

01+D 004 200 094



July 12, 1982

Regional Administrator  
U.S. Environmental Protection Agency  
Attn: RCRA Financial Requirements  
Box A 3587  
Chicago, Illinois 60690 3587

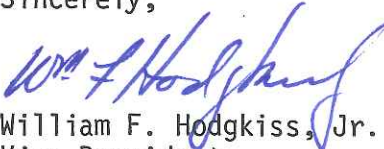
Re: Premix, Inc.  
North Kingsville, Ohio 44068

The above corporation has contacted our bank in reference to the financial requirements for EPA Hazardous Waste. The total funding required to enact the approved closing plan amounts to \$17,360.00

Our bank currently provides Premix, Inc. with a \$3,850,000 Line of Credit which is seldom totally utilized. With a net worth of approximately \$8,000,000 and the \$3,850,000 Line of Credit it would appear that Premix, Inc. could more than adequately cover the financial requirements of \$17,360.00 should the Hazardous Waste closing plan be instituted. Therefore, it would appear unnecessary for our customer to incur additional expense associated with a formal Letter of Credit.

If your office would like to discuss this any further, please feel free to contact me at your convenience.

Sincerely,

  
William F. Hodgkiss, Jr.  
Vice President

WFH/dam

Schedule of Closure  
OAC 3745-66-13 (A and B)  
and 40 CFR 265.113 (a thru b)

Within ninety day after receiving approval of the approved closure plan, all waste will be removed from the closure unit and disposed of off-site at licensed TSDF's, in accordance with the approved closure plan.

Within one hundred and eighty days of waste removal disposal, final closure activities will be completed in accordance with the approved closure plan.

Disposal/Decontamination  
(40 CFR 265.114 and OAC 3745-66-14)

1. During final closure period, all contaminated equipment or structures will be properly decontaminated or disposed of.
2. Any equipment used to collect samples and to remove contaminants shall be adequately decontaminated following use, by washing with an appropriate cleaner and thru triple rinsing.
3. Any waste generated by decontamination will be analyzed and then incinerated at a licensed TSDF.

Certification of Closure  
(OAC 3745-66-15)

Within sixty days of completion of closure, a certification of closure will be submitted, by registered mail to the Regional Administrator.

The certification will be signed by the owner/operator and by the Independent registered professional engineer, who documented the closure.

dgl  
12/14/87

AUG 10 1981

5AHWM

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Debra Hall  
Premix, Inc.  
P.O. Box 28  
North Kingsville, Ohio 44004

Certificate of insurance

Facility EPA ID No. OHD004200044

Dear Ms. Hall:

The U.S. Environmental Protection Agency (USEPA) has postponed the effective date for submission of proof of financial responsibility from the scheduled July 13, 1981, until October 13, 1981. Enclosed is a copy of the notice announcing postponement which was published in the Federal Register on May 18, 1981 (46 FR 27119). To enable you to minimize costs in the period before October 13, 1981, we are returning your certificate of insurance. USEPA is also anticipating some changes this fall in the regulatory wording required in the various financial instruments. Therefore, you may wish to contact us for any relevant changes in the regulations later this year.

If you have any questions, please do not hesitate to contact Tom Golz of my staff at (312) 886-4023.

Sincerely,

Karl J. Klepitsch, Jr.,  
Chief, Waste Management Branch

Enclosures: Liability insurance policies  
May 18, 1981 Federal Register

5A&HWMB:A.KAWATACHI:B.THOMPSON:8/6/81



**C.2 Compliance  
And Enforcement**



State of Ohio Environmental Protection Agency

Northeast District Office

E. Aurora Road  
sburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor  
Christopher Jones, Director

July 8, 2004

**RE: PREMIX, INC.  
LARGE QUANTITY GENERATOR  
OHD 004 200 044  
ASHTABULA COUNTY**

Bill Kennedy, CEO  
Premix, Inc.  
P.O. Box 281  
North Kingsville, OH 44068

Dear Mr. Kennedy:

On June 10, 2004 Brenda Oswald of the US EPA and I conducted an inspection of Premix, Inc. located at Rt. 20 and Harmon Road in North Kingsville, Ohio. Ms. Oswald inspected to determine Premix's current state of compliance with the organic air emission standards contained in the Code of Federal Regulations, Title 40, Parts 264/265. She will provide a separate letter covering this.

The purpose of my inspection was to determine Premix's state of compliance with Ohio's hazardous waste, used oil, and universal waste laws as found in Chapter 3734 of the Ohio Revised Code and Chapter 3745 of the Ohio Administrative Code and to discuss pollution prevention options. We did not conduct a complete inspection covering all rules and reviewing all paperwork. This was because I had conducted such an inspection in September 2003 and the processes and waste management did not appear to have changed greatly. We did, however, review the waste generated and conduct a tour of the plant and some of the outside areas. Please see the enclosed process description/waste activities summary sheets.

No violations of Ohio's hazardous waste, used oil, or universal waste laws were found.

Ms. Coltman did mention that, at times, partially full drums of spent SP331 FV (generated in the laboratory) are shipped out in order to comply with the 90 day accumulation limit. We discussed that this waste may be able to be stored in the same drum as the spent SP173C in order to avoid this problem.

Also enclosed is a list of references regarding energy conservation.

Premix may be able to reduce its operating costs with waste minimization and energy conservation practices. The Ohio EPA offers Pollution Prevention Assessments to help you decide which practices would benefit your operations. Ms. Coltman and I are in the process of setting up such as assessment for your office operations. This will focus on such things as paper use reduction. If you would like to have an expanded or additional Pollution Prevention Assessment or would like more information regarding waste minimization, please contact me. The Office of Pollution Prevention web site at <http://www.epa.state.oh.us/opp/oppmain.html> also has information regarding waste minimization.



(\*) DRAFT STATE LETTER.

July , 2004

RE: PREMIX, INC.

LARGE QUANTITY GENERATOR

OHD 004 200 044

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You can find copies of the laws and other information on the Ohio EPA web page at [www.epa.state.oh.us](http://www.epa.state.oh.us). If you have any questions, please contact me by phone at (330) 963-1217, or by email at [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us).

Sincerely,

## State INSPECTION REPORT

Premix, Rt. 20 and Harmon Road, North Kingsville, OH (OHD 004 200 044)

6-10-04

Brenda Oswald, US EPA

Robert Almquist, Ohio EPA (notes of)

We met with Kenna Coltman, Ken Lazo, and John Tackett. They are a Title 5 air pollution facility. They use heater bands to polymerize some waste in an outside unit. Ethyle acetate is the main solvent they use for cleanup. They have talked to some companies about getting a solvent recycler. They have determined that there is a big cost savings to running the polymerization unit. Kenna has posted some of their waste material on Ohio Materials Exchange (OMEX) but has not gotten any takers. They are looking to become certified ISO 14001 next year. ISO 14001 is an environmental management system. In early 2004 they updated their contingency plan. They have it in Adobe electronic form. They did hazardous waste refresher training in Jan. 2004.

We then took a tour of the facility. It had new looking lights. It had a strong solvent smell. They tried covered drum lids, but the screens go clogged. They save the pipe cleanout from loading to be used for the next pump flush. The large tank washer we saw uses SP-298 to clean the tanks. They have 3 air compressors. As part of their scrap (waste paste) reduction they got rid of the AB system because it was prone to leaks. Waste in the labs is collected in gallon, glass jugs. These are put into lab packs which go out every 90 days. At the pump and pipe cleaning area there are five washers - 3 are ethyl acetate and 2 are SP-298.

They make bulk molded compound (used for injection molding) and sheet molded compound. All the molding they do there is closed molding. They have injection molding machines. Premix is now getting products in drums that are UN certified so that they can be used to ship waste out.





## Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist  
☒ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☐ Information Request  
☐ Pre-Filing and Opportunity to Confer  
☐ State Notification of Enforcement Action

Facility Name : PREMIX

Facility Location: P.O. BOX 281

City: NORTH KINGSVILLE State: OH

U.S. EPA ID# OHD 004200044

Assigned Staff Bruce Connel Phone: 3-4796

Name	Signature	Date
Author	<u>Bruce Connel</u>	<u>7-6-04</u>
Regional Counsel		
Section Chief	<u>RLH</u>	<u>7/9/04</u>
Branch Chief		

### Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
  - One copy for the assigned staff;
  - One copy for the section file;
  - One copy for the branch file; and
  - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.  
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

7001 0320 0006 0172 2664





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE-9J

**JUL 12 2004**

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Bill Kennedy  
Chief Executive Officer  
Premix, Inc.  
P.O. Box 281  
North Kingsville, OH 44068

Re: Compliance Evaluation Inspection  
EPA I.D. No.: OHD 004 200 044

Dear Mr. Kennedy:

On June 10, 2004, representatives of the United States Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) inspected Premix located in North Kingsville, Ohio. The U.S. EPA's purpose for the inspection was to evaluate your facility's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically the Air Emission Standards Applicable to Generators of Hazardous Waste set forth in 40 CFR 265, Subparts AA, BB, and CC. Enclosed, please find copies of the applicable checklists and the federal inspection report dated June 18, 2004.

As of this writing, based upon information available to the U.S. EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. The OEPA will issue a separate letter regarding their findings based on the general Standards Applicable to Generators of Hazardous Waste. The U.S. EPA and OEPA will continue to evaluate your facility in the future.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**MEMORANDUM**

**DATE:** June 18, 2004

**TO:** File

**FROM:** Brenda Oswald - Environmental Engineer  
Waste, Pesticides and Toxics Division  
Enforcement and Compliance Assurance Branch  
Compliance Section 2

**SUBJECT:** Inspection Notes for June 10, 2004  
Compliance Evaluation Inspection - Premix  
OHD 004 200 044  
Large Quantity Generator

A joint Compliance Evaluation Inspection (CEI) of Premix, located at Rt. 20 and Harmon Road, North Kingsville, OH 44068, was conducted on June 10, 2004. The federal portion of the inspection focused on 40 CFR 265, Subparts AA, BB, and CC. The following people were present for this inspection:

Kenna Coltman , PE, CHMM - Environmental Manager	Premix
Ken Lazo - Director Human Resources	Premix
John Tackett - Operations Manager	Premix
Robert Almquist - Division of Hazardous Waste Management	OEPA
Brenda Oswald - Environmental Engineer	U.S. EPA

**Facility Background**

Premix develops, formulates and manufactures thermoset compounds. The corporation was founded in 1958 and operations at the North Kingsville plant began prior to 1980. Premix products are used in various sectors such as the aerospace, automotive, appliance, electric and

recovery. Premix has developed a color-coding method to prevent unintentional mixing of ethyl acetate with any other solvents so as to reduce the amount of hazardous waste produced.

When the machinery is cleaned out for a color change, plastic is used to line the floor to catch resin that drips out of the open pipes. Drum liners, gloves and other debris become contaminated with ignitable paste and all are treated as hazardous waste.

Fluorescent bulbs (taken by Air Cycle, IN) and batteries are treated as universal waste. Air Cycle also takes computer equipment and other light bulbs.

The facility no longer houses any paint lines or bake ovens. The old paint room is now used as a storage area for molds.

### Facility Tour

The tour began in the Molding Division at the southwest end of the plant. Specially formulated fiberglass materials, which are processed in the Compound Division, are molded into high strength, light-weight items such as firefighter helmets. One drum was held in a metal storage room in this division. It contained hydrocarbon-based solvents from the machine room. The drum was closed and labeled. Further north along the west wall, was an area set aside for fire protection equipment including a small vehicle able to transport fire suppressant foam to the main indoor 90 day storage area and outside to the waste polymerization unit and second main 90 day storage area.

The Compound Division is the northern sector of the facility. Near the south wall of this section was a drum of waste ethyl acetate that was labeled, dated from 03/26/04, and treated as a 90 day area with weekly inspections and a spill kit. Because this drum fills up slowly, the inspectors suggested making it a satellite drum as it is near the point of waste generation and under the control of the operator.

Upstairs on a mixing platform for the different paste formulations, another small 90 day area with 3 drums was positioned next to a tank washer. All drums were closed, labeled with a description of the material and the words "Hazardous Waste, " and dated as 5/20/04, 6/08/04, and 4/16/04. A spill kit is next to the drums as well. Approximately 20 feet from these three drums was a satellite container holding waste polyester resins labeled as hazardous waste and closed. The tank washer is approximately 6 feet square. Premix holds a Permit to Install for daily emissions tracking even though it is classified as an insignificant emissions source. The solvent used in the tank washer is non-hazardous SP-298.

Downstairs, on the main floor, is another small 90 day area with 2 drums. A container of waste ethyl acetate was closed, labeled, and dated as 5/21/04. The second drum containing waste polyester pastes was closed, labeled, and dated 6/09/04. A spill kit is located nearby.

40 CFR § 265 Subparts AA, BB, and CC

This facility is exempt from RCRA air emissions regulations of 40 CFR § 265, Subparts AA, and BB. Subpart AA does not apply because the facility does not have any process vents associated with distillation, fractionation, thin film evaporation, solvent extraction, or air stripping units. Subpart BB is not applicable because the facility does not have equipment (pumps, compressors, pressure release devices, sampling connections, open-ended valves and lines, valves, flanges or connectors) associated with units as delineated in 40 CFR § 265.1050(b)(1)-(3). Subpart CC does apply to this generator. All containers in 90 day storage areas, however, were properly closed and inspected.

# INTERIM STATUS FACILITIES ORGANIC AIR EMISSION STANDARDS FOR PROCESS VENTS

AA

Facility's Name PREMIX  
Date 6-10-04 ID# 0HD 004 200 044

Note: Use of the words "process vents" means process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 ppmw (time weight annual average basis).  
Note: Total Organic Emissions shall be abbreviated to TOE

(rev. 7/3/96 - EAB-MDEQ)

**DO NOT HAVE PROCESS VENTS  
ASSOCIATED WITH THE ABOVE.**

NI - not inspected

N/A - not applicable

YES	NO	NI	N/A
-----	----	----	-----

## APPLICABILITY (40 CFR 265.1030)

1. Manage hazardous waste w/ organic concentrations of at least 10 ppmw in units w/ process vents? (265.1030(b))	DAE	<u>NO</u>
--	-----	-----------

IF YES

a) Are the units subject to the permitting requirements under part 270? (265.1030(b)(1))	DAE	*
--	-----	---

OR

b) Are there hazardous waste recycling units with process vents that are located at the facility that is otherwise subject to the permitting requirements? (265.1030(b)(2))	DAE	*
---	-----	---

\* If the answers to the above questions is no the following regulations do not apply, except you must verify the facility waste has less than 10 ppmw: see 40 CFR 265.1034(d) and 40 CFR 265.1034(e) and this information must be recorded in a log: 40 CFR 265.1035(f).

## STANDARDS: PROCESS VENTS (40 CFR 265.1032)

Note: A determination of vent emissions may be based on engineering calculations or tests (265.1032(c)) with any performance tests meeting the requirements of 265.1034(c).

2. Has the owner/operator of a facility with process vents:		
a) Reduced TOE from all affected process vents < 1.4 kg/h (3 lb/h) & 2.8 mg/yr (3.1 tons/yr)? (265.1032(a)(1))	DAE	<input type="checkbox"/> NI N/A

OR

b) Reduced, by use of a control device (that meets the requirements of 265.1033) the TOE from all affected process vents by 95 weight percent? (265.1032(a)(2))	DAE	<input type="checkbox"/> NI N/A
---	-----	---------------------------------

Note: If the process vents emit below the limits with out an add-on control device the facility the only additional requirement is 265.1035(f)

## STANDARDS: CLOSED-VENT SYSTEMS AND CONTROL DEVICES (40 CFR 265.1033)

3. Was a closed-vent system and control device installed by 12/21/90 or as per an implementation schedule with a completion date as soon as possible but no later than June 21, 1992? (265.1033(a)(2))	DAE	<input type="checkbox"/> NI N/A
4. If the owner/operator has installed a closed-vent system and control device by their effective date, was: (265.1033(a)(1))		
a) Control device involving vapor recovery designed/operated to recover organic vapors vented to it w/ an efficiency of 95 weight percent or greater? (265.1033(b)) (N/A if TOE for all affected process vents can be attained at an efficiency less than 95 weight percent?)	DAE	<input type="checkbox"/> NI N/A
b) Enclosed combustion device designed and operated to reduce organic emissions vented to it by 95 weight percent or greater to: (265.1033(c))		
i) Achieve a total organic compound concentration of 20 ppmv?	DAE	<input type="checkbox"/> NI N/A

OR

ii) Provide minimum resident time of 0.50 seconds at minimum temp. of 760 degrees C? (265.1033(c))	DAE	<input type="checkbox"/> NI N/A
c) A flare:		
i) Designed/operated w/ no visible emissions except periods not to exceed total of 5 minutes during any 2 consecutive hours? (265.1033(d)(1))	DAE	<input type="checkbox"/> NI N/A
ii) Operated with a flame present at all times? (265.1033(d)(2))	DAE	<input type="checkbox"/> NI N/A



YES NO NI N/A

- b) Monitor device w/ continuous recorder to measure parameter that indicates the carbon bed is regenerated on a regular predetermined time cycle?

DAE

[ ] NI N/A

AND

- c) Replaces existing carbon w/ fresh at pre-set interval no longer than carbon service life? (265.1033(g))

DAE

[ ] NI N/A

- viii) If using a carbon adsorption system that does not regenerate carbon bed on-site in the control device, the existing carbon will be replaced w/ fresh carbon on a regular basis by either: (265.1033(h)(1-2))

- a) Monitoring the concentration level of the organic compounds regularly and replace the carbon with fresh immediately after break-through?

- i) Monitoring daily?

DAE

[ ] NI N/A

- ii) Monitoring at interval no greater than 20% of time required to consume total carbon working capacity?

DAE

[ ] NI N/A

- b) Replace the existing carbon with fresh at regular, predetermined intervals?

DAE

[ ] NI N/A

- c) Inspecting readings from (except 265.1033(h)) monitoring device(s) at least once each operating day? (265.1033(f)(3))

DAE

[ ] NI N/A

AND

- d) If needed, implement necessary corrective measures to ensure control devices work? (265.1033(f)(3))

DAE

[ ] NI N/A

Note: An alternative operational or process parameter may be monitored see 40 CFR 265.1033(i).

6. The closed-vent system(s):

- a) Was it designed for and operated with no visible emissions? (265.1033(j)(1))

DAE

[ ] NI N/A

- b) Have initial leak detection monitoring conducted: (265.1033(j)(2))

- i) By date facility becomes subject to these regulations?

DAE

[ ] NI N/A

- ii) Annually thereafter?

DAE

[ ] NI N/A

- c) Control detectable emissions (> 500 ppm) as soon as possible but: (265.1033(j)(3-4))

- i) No later than 15 calendar days after detected?

DAE

[ ] NI N/A

- ii) First attempt at repair made no later than 5 calendar days after detection?

DAE

[ ] NI N/A

7. Were closed-vent systems and control devices operated at all times when emissions may be vented to them? (265.1033(k))

DAE

co. rep said  
[ ] NI N/A

TEST METHODS AND PROCEDURE (40 CFR 265.1034)

8. Were correct test methods and procedures used? (265.1034(a))

- a) For a closed-vent system tested for no detectable emissions? (265.1034(b)(1-7))

DAE

[ ] NI N/A

- b) To determine compliance with the 10 ppmw and with the total organic compound limit (95%)? (265.1034(c))

DAE

[ ] NI N/A

9. Did the facility determine that the process vents are not subject to the requirements of this subpart? If so, did the owner/operator make an initial determination that the time-weighted annual average total organic concentration managed by the unit is less than 10 ppmw by: (265.1034(d))

- a) Direct measurement? (265.1034(d)(1))

DAE

[ ] NI N/A

- b) Using knowledge? (265.1034(d)(2))

DAE

[ ] NI N/A

10. Was the determination that distillation, fractionation, thin-film evaporation, solvent extraction or air or stream stripping operations manage hazardous wastes time-weighted annual average total organic concentration is less than 10 ppmw made as follows: (265.1034(e))

- i) By date the facility is first subject to the regulations or the date the waste is first managed, whichever is first?

DAE

[ ] NI N/A

- j) For continuously generated waste annually?

DAE

[ ] NI N/A

		YES	NO	NI	N/A
e)	Condenser, consider vent stream composition/constituent composition/flow rate/relative humidity & temp. Include design outlet organic compound concentration level, design average temp. of the exhaust vent stream, and the design average temp. of the coolant fluid at the condenser outlet and inlet? (265.1035(b)(4)(iii)(E)) DAE	<input type="checkbox"/>		NI	N/A
f)	Carbon adsorption system that regenerates bed on-site in the control device, consider the vent stream composition/constituent concentrations/flow rate/relative humidity/temperature. Include design exhaust vent stream organic compound concentration level/number & capacity of carbon beds/type & capacity of activated carbon/total stream flow/bed steaming/cooling/drying cycles/temp. regeneration/time of regeneration/service life? (265.1035(b)(4)(iii)(F)) DAE	<input type="checkbox"/>		NI	N/A
g)	Carbon adsorption system that does not regenerate on-site in a control device, consider the vent stream composition/constituent concentrations/flow rate/relative humidity/temperature. Include the design outlet organic concentration level/capacity of the bed/type & capacity of the carbon in the bed/replacement interval? (265.1035(b)(4)(iii)(G)) DAE	<input type="checkbox"/>		NI	N/A
e)	A statement signed/dated by the owner/operator certifying that the operating parameters used in the design analysis reasonably represent the conditions that exist when the hazardous waste management unit is or would be operating at the highest load or capacity level reasonably expected to occur? (265.1035(b)(iv)) DAE	<input type="checkbox"/>		NI	N/A
f)	A statement signed/dated by the owner/operator certifying that the control device is designed to operate at an efficiency of $\geq 95\%$ (are alternatives)? A statement from the device manufacture or vendor certifying that the control equipment meets the design specifications will suffice? (265.1035(b)(v)) DAE	<input type="checkbox"/>		NI	N/A
g)	If test performance tests are used to demonstrate compliance, all test results? (265.1035(b)(vi)) DAE	<input type="checkbox"/>		NI	N/A
h)	Design documentation & monitoring/operating & inspection information for each closed-vent system/control device recorded, kept up-to-date and including: (265.1035(c))				
i)	Description and date of each modification? (265.1035(c)(1)) DAE	<input type="checkbox"/>		NI	N/A
ii)	Id operating parameters/describe monitoring devices/diagram monitoring sensor locations? (265.1035(c)(2)) DAE	<input type="checkbox"/>		NI	N/A
iii)	Monitoring/operating & inspection information required in 265.1033(f-j)? (265.1035(c)(3)) DAE	<input type="checkbox"/>		NI	N/A
iv)	Date, time and duration when monitoring values exceed the value established? (265.1035(c)(4)) DAE	<input type="checkbox"/>		NI	N/A
v)	Explanation for each period the control device operating parameter exceeded the design value & the measures implemented to correct the control device? 265.1035(c)(5) DAE	<input type="checkbox"/>		NI	N/A
vi)	Carbon adsorption systems where the carbon is regenerated in the control device or a system that changes the carbon at a regular, predetermined interval give the date when existing carbon is replaced? (265.1035(c)(6)) DAE	<input type="checkbox"/>		NI	N/A
vii)	For a carbon adsorption system that changes the carbon at breakthrough have a log that records: (265.1035(c)(7)(i-ii))				
a)	Date and time of breakthrough and the monitoring device reading? DAE	<input type="checkbox"/>		NI	N/A
b)	Date when existing carbon is replaced with fresh carbon? DAE	<input type="checkbox"/>		NI	N/A
viii)	Date of control device start up and shut down? (265.1035(c)(8)) DAE	<input type="checkbox"/>		NI	N/A
i)	Control device other than thermal or catalytic vapor incinerator/flare/boiler/process heater/condenser/carbon adsorption bed, the monitoring/inspection information indicating proper operation & maintenance? (265.1035(e)) DAE	<input type="checkbox"/>		NI	N/A
j)	Up-to-date information/data used to determine if a process vent falls under (265.1032) & supporting documentation (265.1034(d)(2)) when knowledge of the nature of hazardous waste stream or process is used? (265.1035(f)) DAE	<input type="checkbox"/>		NI	N/A
12.	Are records of monitoring, operating and inspection information kept at least 3 years? (265.1035(d)) DAE	<input type="checkbox"/>		NI	N/A

**INTERIM STATUS FACILITIES AND FULLY REGULATED GENERATOR  
ORGANIC AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS**

B8

Facility's Name PREMIX

Date 6-10-04 ID# 04D 004 200 044

Use of the words "process vents" means process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 ppmw (time weight annual average basis).

Note: Total Organic Emissions shall be abbreviated to TOE

Note: Equipment with closed-vent systems and control devices shall comply with the provisions of section 265.1033.

(rev. 4/25/97 [2/99, new] - EAB-MDEQ)

NI - not inspected

N/A - not applicable

YES NO NI N/A

**APPLICABILITY (40 CFR 265.1050)**

1. If the equipment contains or contacts hazardous waste w/ organic concentrations of at least 10 percent by weight:

a) Are the units subject to the permitting requirements of part 270? (265.1050(b)(1))

DAE

No \*

OR

b) Are there hazardous waste recycling units located at the facility that are otherwise subject to the permitting requirements? (265.1050(b)(2))

DAE

No \*

\* If the answers to the above questions are no the following regulations do not apply.

**STANDARDS: PUMPS IN LIGHT LIQUID (40 CFR 265.1052)**

Note: Delays in repair are allowed see 265.1059 (#37)

Note: Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-1)) (#41)

2. Pump equipped w/ dual mechanical seal system that includes a barrier fluid system? If yes, its exempt from monthly monitoring (#5) and visual inspections (#6) if: (265.1052(d))

NI N/A

a) Each dual mechanical seal system is:

i) Operated with a barrier fluid with pressure greater than the pump stuffing box pressure. (265.1052(d)(1)(i))

DAE

☐

NI N/A

OR

ii) Has a barrier fluid degassing reservoir connected by closed-loop to a control device. (265.1052(d)(1)(ii))

DAE

☐

NI N/A

OR

iii) System that purges the barrier fluid into a hazardous waste stream w/no detectable emissions? (265.1052(d)(1)(iii))

☐

NI N/A

b) Barrier fluid is not a hazardous waste w/ organic concentrations 10% or greater by weight. (265.1052(d)(2))

DAE

☐

NI N/A

c) Each barrier fluid system equipped w/ a sensor to detect failure of the seal/barrier fluid system. (265.1052(d)(3))

DAE

☐

NI N/A

d) Each calendar week pump has visual inspection for signs of liquids dripping from pump seals. (265.1052(d)(4))

DAE

☐

NI N/A

e) Each sensor is checked: (265.1052(d)(5)(i))

i) Daily.

DAE

☐

NI N/A

OR

ii) Equipped with audible alarm that is checked monthly to see if working.

DAE

☐

NI N/A

f) Owner/operator has determined a criteria indicating failure of the seal/barrier fluid system. (265.1052(d)(5)(ii))

DAE

☐

NI N/A

g) Indications of liquids dripping from pump seal/sensor means failure of seal/barrier fluid system & a leak has been detected: (265.1052(d)(6)(i))

i) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(d)(6)(ii))

DAE

☐

NI N/A

ii) A first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1052(d)(6)(iii))

DAE

☐

NI N/A

The pump designed as in 264.1064(g)(2) for no detectable emissions as indicated by an instrument reading of < 500 ppm above background? Yes, pump exempt from monthly monitoring (#5), visual monitoring (#6), repairs (#7a & #7b) and barrier fluid system (#2) if: (265.1052(e))

NI N/A

a) It does not have an externally actuated shaft penetrating the pump housing. (265.1052(e)(1))

DAE

☐

NI N/A

		YES	NO	NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(g)(1))	DAE	<input type="checkbox"/>		NI	N/A
b) Was a first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1052(g)(2))	DAE	<input type="checkbox"/>		NI	N/A

**STANDARDS: PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE (40 CFR 265.1054)**

NOTE: Delays in repair are allowed see 265.1059 (#37)

17. Is the pressure relief device equipped with a closed-vent system capable of capturing and transporting leakage to a control devices specified in 265.1060? If yes, the device is exempt from relief device monitored for no detectable emissions (#18), specifications to reset device and time frame (#19 & #20). (265.1054(c))	DAE			NI	N/A
18. Pressure relief devices in gas/vapor service operated w/ no detectable emissions indicated by an instrument reading of < 500 ppm above background, except during pressure releases? (265.1054(a))	DAE	<input type="checkbox"/>		NI	N/A
19. After a pressure release, was the device returned to a condition of no detectable emissions indicated by an instrument reading of < 500 ppm above background, as soon as practical but no later than 5 calendar days? (265.1054(b)(1))	DAE	<input type="checkbox"/>		NI	N/A
20. No later than 5 calendar days after a pressure release, is the pressure relief device monitored to confirm no detectable emissions indicated by an instrument reading of < 500 ppm above background,? (265.1054(b)(2))	DAE	<input type="checkbox"/>		NI	N/A

**STANDARDS: SAMPLING CONNECTING SYSTEMS (40 CFR 265.1055)**

21. Is the sampling system <i>in situ</i> ? If yes, the system isn't required to have closed-vent or closed-purge system (#22 & #23). (265.1055(c))				NI	N/A
22. Is each sampling connection system equipped with a closed-purge system or closed-vent system? (265.1055(a))		<input type="checkbox"/>		NI	N/A
23. Does each closed-purge or closed-vent system: (265.1055(b))					
a) Return purged hazardous waste stream directly to hazardous waste management process line w/ no detectable emissions? (265.1055(b)(1))	DAE	<input type="checkbox"/>		NI	N/A

OR

b) Collect and recycle the purged hazardous waste stream with no detectable emissions? (265.1055(b)(2))	DAE	<input type="checkbox"/>		NI	N/A
---	-----	--------------------------	--	----	-----

OR

c) Designed/operated to capture/transport all purged hazardous waste stream to a control device? (265.1055(b)(3))	DAE	<input type="checkbox"/>		NI	N/A
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**STANDARDS: OPEN-ENDED VALVES OR LINES (40 CFR 265.1056)**

Note: Delays in repair are allowed see 265.1059 (#37)

Note: Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-1)) (#41)

24. Is each open-ended valve or line equipped with a cap, blind flange, plug or second valve? (265.1056(a)(1))	DAE	<input type="checkbox"/>		NI	N/A
25. Cap/blind flange/plug/second valve always seal open end except when waste must flow through? (265.1056(a)(2))	DAE	<input type="checkbox"/>		NI	N/A
26. If using a second valve, is the first valve closed before the second? (265.1056(b))	DAE	<input type="checkbox"/>		NI	N/A
27. If a double block and bleed system is used and the bleed line/valve stays open during venting, is the line between the block valves have cap/blind flange/plug/second valve and sealed at all other times? (265.1056(c))	DAE	<input type="checkbox"/>		NI	N/A

**STANDARDS: VALVES IN GAS/VAPOR SERVICE OR IN LIGHT LIQUID SERVICE (40 CFR 265.1057)**

Note: There are alternate standards for valves in gas/vapor or light liquid service where owners/operators may elect to have all valves within a hazardous waste management unit comply with alternative standards which: (1) allows no greater than 2% of the valves to leak. (265.1061(a-d) and (2) allows for skip period leak detection and repair. (265.1062(a-b))

Note: Delays in repair are allowed see 265.1059 (#37)

Valve designated as an unsafe-to-monitor valve as described in 265.1064(h)(1). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(g))	DAE			NI	N/A
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		YES	NO	NI	N/A
c) Was the first repair attempt include, but not limited to: (265.1058(d))					
i) Tightening of bonnet bolts?	DAE	<input type="checkbox"/>		NI	N/A
ii) Replacement of bonnet bolts?	DAE	<input type="checkbox"/>		NI	N/A
iii) Tightening of packing gland nuts?	DAE	<input type="checkbox"/>		NI	N/A
iv) Injection of lubricant into lubricating packing?	DAE	<input type="checkbox"/>		NI	N/A

**STANDARDS: DELAY OF REPAIR (40 CFR 265.1059)**

37. Was there a delay in repair of equipment for which leaks have been detected? If yes, the delay is allowed if:	DAE		NI	N/A
a) Was the repair technically infeasible without a shutdown of the hazardous waste management unit and did the repair occur before the end of the next shutdown? (265.1059(a))	DAE	<input type="checkbox"/>	NI	N/A
b) Was the equipment isolated from the hazardous waste management unit and the unit does not contain or contact hazardous waste with organic concentrations at least 10% by weight. (265.1059(b))	DAE	<input type="checkbox"/>	NI	N/A
38. Was there a delay in repair of a valve? If yes, the delay is allowed if:	DAE		NI	N/A
a) Determine emissions from purged material from immediate repair are greater than emissions resulting from a delay of the repair. (265.1059(c)(1))		<input type="checkbox"/>	NI	N/A
b) When repaired, the purged material is collected and destroyed or recovered in a control device. (265.1059(c)(2))	DAE	<input type="checkbox"/>	NI	N/A
39. Was there a delay in repair of a pump? If yes, the delay will be allowed if:	DAE		NI	N/A
a) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system. (265.1059(d)(1))	DAE	<input type="checkbox"/>	NI	N/A
b) Repair is completed as soon as practicable but within 6 months. (265.1059(d)(2))	DAE	<input type="checkbox"/>	NI	N/A
40. Was there a delay in repair of a valve beyond a hazardous waste management unit shutdown? If yes, the delay will be allowed until the next shutdown or longer if the shutdown is within 6 months if: (265.1059(e))	DAE		NI	N/A
a) The valve assembly replacement is necessary during shutdown.	DAE	<input type="checkbox"/>	NI	N/A
b) Valve assembly supplies have been depleted & supplies were sufficiently stocked before supplies were depleted.	DAE	<input type="checkbox"/>	NI	N/A

**TEST METHODS AND PROCEDURES (40 CFR 265.1063)**

41. Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-1))				
a) For leak detection monitoring? (265.1063(b))	DAE	<input type="checkbox"/>	NI	N/A
b) For 'no detectible' emissions determination? (265.1063(c))	DAE	<input type="checkbox"/>	NI	N/A
c) To determine if each piece of equipment contains or contacts a hazardous waste w/ organic concentrations $\geq$ 10% by weight? (265.1063(d))	DAE	<input type="checkbox"/>	NI	N/A
d) To determine if pumps or valves are in light liquid service? (265.1063(h))	DAE	<input type="checkbox"/>	NI	N/A
e) To determine if the control device achieved 95 weight percent organic emissions? (265.1063(i))	DAE	<input type="checkbox"/>	NI	N/A
42. Were samples used in determine the percent organic content representative of the highest TOC hazardous waste that is expected to be contained in or contact the equipment? (265.1063(g))	DAE	<input type="checkbox"/>	NI	N/A

**RECORDKEEPING REQUIREMENTS (40 CFR 265.1064)**

Note: Owners/operators with more than one hazardous waste management unit, subject to these regulations, may use one recordkeeping system if each unit is identified.

Did the owners/operators record the following information in the operating record for each piece of equipment subject to Subpart BB? (265.1064(b))



		YES	NO	NI	N/A
1) Dates of each test? (265.1064(g)(4)(i))	DAE	<input type="checkbox"/>		NI	N/A
2) Background level measured during each test? (265.1064(g)(4)(ii))	DAE	<input type="checkbox"/>		NI	N/A
3) The maximum instrument reading measured at the equipment during each test? (265.1064(g)(4)(iii))	DAE	<input type="checkbox"/>		NI	N/A
e) List of all identification numbers for equipment in vacuum service? (265.1064(g)(5))	DAE	<input type="checkbox"/>		NI	N/A
vi) A log with a list of identification numbers for the valves that are designated unsafe or difficult to monitor, an explanation stating why they are unsafe or difficult and the plan for monitoring? (265.1064(h)(1-2))	DAE	<input type="checkbox"/>		NI	N/A
vii) For valves in gas/vapor or light liquid service with alternative standards the operating record will record: (265.1064(i))					
a) A schedule of monitoring? (265.1064(i)(1))	DAE	<input type="checkbox"/>		NI	N/A
b) The percent of valves found leaking during each monitoring period? (265.1064(i)(2))	DAE	<input type="checkbox"/>		NI	N/A
viii) Is the following information shall be recorded in a log and kept in the operating record: (265.1064(j))					
a) Criteria for failure of seal system indicated by sensor used w/ light liquid service pumps? (265.1064(j)(1))	DAE	<input type="checkbox"/>		NI	N/A
b) Criteria for failure of seal system indicated by sensor used w/ compressors? (265.1064(j)(1))	DAE	<input type="checkbox"/>		NI	N/A
c) Any changes to these criteria and the reason for change? (265.1064(j)(2))	DAE	<input type="checkbox"/>		NI	N/A
ix) The following information kept in a log and used to determine exemptions for the hazardous waste management unit: (265.1064(k))					
a) An analysis determining the design capacity of the management unit? (265.1064(k))	DAE	<input type="checkbox"/>		NI	N/A
b) A statement listing the hazardous waste influent to and effluent from each unit and analysis determining whether the waste is a heavy liquid? (265.1064(k)(2))	DAE	<input type="checkbox"/>		NI	N/A
c) Up-to-date analysis/supporting data used to determine if equipment is subject to standards? (265.1064(k)(3))	DAE	<input type="checkbox"/>		NI	N/A
d) Documentation when knowledge of the hazardous waste stream or process is used? (265.1064(k)(3))	DAE	<input type="checkbox"/>		NI	N/A
e) Any new determinations if the owner/operator takes any action that could result in an increase of the organic content of the waste? (265.1064(k)(3))	DAE	<input type="checkbox"/>		NI	N/A
43. Are records of equipment leak information in 265.1064(d) and closed-vent and control device information in 265.1064(e) kept 3 years? (265.1064(l))	DAE	<input type="checkbox"/>		NI	N/A

Comments: \_\_\_\_\_



State of Ohio Environmental Protection Agency

Northeast District Office

E. Aurora Road  
Ashtabula, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor  
Christopher Jones, Director

July 8, 2004

RE: **PREMIX, INC.  
LARGE QUANTITY GENERATOR  
OHD 004 200 044  
ASHTABULA COUNTY**

Bill Kennedy, CEO  
Premix, Inc.  
P.O. Box 281  
North Kingsville, OH 44068

Dear Mr. Kennedy:

On June 10, 2004 Brenda Oswald of the US EPA and I conducted an inspection of Premix, Inc. located at Rt. 20 and Harmon Road in North Kingsville, Ohio. Ms. Oswald inspected to determine Premix's current state of compliance with the organic air emission standards contained in the Code of Federal Regulations, Title 40, Parts 264/265. She will provide a separate letter covering this.

The purpose of my inspection was to determine Premix's state of compliance with Ohio's hazardous waste, used oil, and universal waste laws as found in Chapter 3734 of the Ohio Revised Code and Chapter 3745 of the Ohio Administrative Code and to discuss pollution prevention options. We did not conduct a complete inspection covering all rules and reviewing all paperwork. This was because I had conducted such an inspection in September 2003 and the processes and waste management did not appear to have changed greatly. We did, however, review the waste generated and conduct a tour of the plant and some of the outside areas. Please see the enclosed process description/waste activities summary sheets.

No violations of Ohio's hazardous waste, used oil, or universal waste laws were found.

Ms. Coltman did mention that, at times, partially full drums of spent SP331 FV (generated in the laboratory) are shipped out in order to comply with the 90 day accumulation limit. We discussed that this waste may be able to be stored in the same drum as the spent SP173C in order to avoid this problem.

Also enclosed is a list of references regarding energy conservation.

Premix may be able to reduce its operating costs with waste minimization and energy conservation practices. The Ohio EPA offers Pollution Prevention Assessments to help you decide which practices would benefit your operations. Ms. Coltman and I are in the process of setting up such as assessment for your office operations. This will focus on such things as paper use reduction. If you would like to have an expanded or additional Pollution Prevention Assessment or would like more information regarding waste minimization, please contact me. The Office of Pollution Prevention web site at <http://www.epa.state.oh.us/opp/oppmain.html> also has information regarding waste minimization.

Bill Kennedy, CEO  
Premix, Inc.  
July 8, 2004  
Page 2

You can find copies of the laws and other information on the Ohio EPA web page at [www.epa.state.oh.us](http://www.epa.state.oh.us). If you have any questions, please contact me by phone at (330) 963-1217, or by email at [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us).

Sincerely,



Robert Almquist  
Division of Hazardous Waste Management

RA:cl

ec: Harry Courtright, DHWM, NEDO

cc: Tammy McConnell, DHWM, CO  
Kenna Coltman, Premix  
Brenda Oswald, US EPA

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

(\*) DRAFT STATE LETTER.

July , 2004

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LARGE QUANTITY GENERATOR  
OHD 004 200 044  
ASHTABULA COUNTY

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Sincerely,

Robert Almquist  
Division of Hazardous Waste Management

RA:cl

ec: Harry Courtright, DHWM, NEDO      cc: Tammy McConnell, DHWM, CO  
Kenna Coltman, Premix  
[kenna.coltman@premix.com](mailto:kenna.coltman@premix.com)  
Brenda Oswald, US EPA  
[oswald.brenda@epa.gov](mailto:oswald.brenda@epa.gov)

**NOTICE:**

**Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.**



## State INSPECTION REPORT

Premix, Rt. 20 and Harmon Road, North Kingsville, OH (OHD 004 200 044)

6-10-04

Brenda Oswald, US EPA

Robert Almquist, Ohio EPA (notes of)

We met with Kenna Coltman, Ken Lazo, and John Tackett. They are a Title 5 air pollution facility. They use heater bands to polymerize some waste in an outside unit. Ethyle acetate is the main solvent they use for cleanup. They have talked to some companies about getting a solvent recycler. They have determined that there is a big cost savings to running the polymerization unit. Kenna has posted some of their waste material on Ohio Materials Exchange (OMEX) but has not gotten any takers. They are looking to become certified ISO 14001 next year. ISO 14001 is an environmental management system. In early 2004 they updated their contingency plan. They have it in Adobe electronic form. They did hazardous waste refresher training in Jan. 2004.

We then took a tour of the facility. It had new looking lights. It had a strong solvent smell. They tried covered drum lids, but the screens go clogged. They save the pipe cleanout from loading to be used for the next pump flush. The large tank washer we saw uses SP-298 to clean the tanks. They have 3 air compressors. As part of their scrap (waste paste) reduction they got rid of the AB system because it was prone to leaks. Waste in the labs is collected in gallon, glass jugs. These are put into lab packs which go out every 90 days. At the pump and pipe cleaning area there are five washers - 3 are ethyl acetate and 2 are SP-298.

They make bulk molded compound (used for injection molding) and sheet molded compound. All the molding they do there is closed molding. They have injection molding machines. Premix is now getting products in drums that are UN certified so that they can be used to ship waste out.



Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist  
☒ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☐ Information Request  
☐ Pre-Filing and Opportunity to Confer  
☐ State Notification of Enforcement Action

Facility Name : PREMIX

Facility Location: P.O. Box 281

City: NORTH KINGSVILLE State: OH

U.S. EPA ID# OH0004200044

Assigned Staff Bruce Gould Phone: 3-4796

Name	Signature	Date
Author	<u>Bruce Gould</u>	<u>7-6-04</u>
Regional Counsel		
Section Chief	<u>PRH</u>	<u>7/9/04</u>
Branch Chief		

**Directions/Request for Clerical Support:**

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
  - One copy for the assigned staff;
  - One copy for the section file;
  - One copy for the branch file; and
  - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.  
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

7801 0320 0006 0172 2664



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE-9J

**JUL 12 2004**

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Bill Kennedy  
Chief Executive Officer  
Premix, Inc.  
P.O. Box 281  
North Kingsville, OH 44068

Re: Compliance Evaluation Inspection  
EPA I.D. No.: OHD 004 200 044

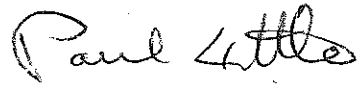
Dear Mr. Kennedy:

On June 10, 2004, representatives of the United States Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) inspected Premix located in North Kingsville, Ohio. The U.S. EPA's purpose for the inspection was to evaluate your facility's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically the Air Emission Standards Applicable to Generators of Hazardous Waste set forth in 40 CFR 265, Subparts AA, BB, and CC. Enclosed, please find copies of the applicable checklists and the federal inspection report dated June 18, 2004.

As of this writing, based upon information available to the U.S. EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. The OEPA will issue a separate letter regarding their findings based on the general Standards Applicable to Generators of Hazardous Waste. The U.S. EPA and OEPA will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Brenda Oswald of my staff at 312-353-4796.

Sincerely,

A handwritten signature in black ink that reads "Paul Little". The signature is written in a cursive, flowing style.

Paul Little, Section Chief  
Enforcement and Compliance Assurance Branch  
Compliance Section 2  
Waste, Pesticides, and Toxics Division

Enclosures

cc: Robert Almquist, OEPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

**MEMORANDUM**

**DATE:** June 18, 2004

**TO:** File

**FROM:** Brenda Oswald - Environmental Engineer  
Waste, Pesticides and Toxics Division  
Enforcement and Compliance Assurance Branch  
Compliance Section 2

**SUBJECT:** Inspection Notes for June 10, 2004  
Compliance Evaluation Inspection - Premix  
OHD 004 200 044  
Large Quantity Generator

A joint Compliance Evaluation Inspection (CEI) of Premix, located at Rt. 20 and Harmon Road, North Kingsville, OH 44068, was conducted on June 10, 2004. The federal portion of the inspection focused on 40 CFR 265, Subparts AA, BB, and CC. The following people were present for this inspection:

Kenna Coltman , PE, CHMM - Environmental Manager	Premix
Ken Lazo - Director Human Resources	Premix
John Tackett - Operations Manager	Premix
Robert Almquist - Division of Hazardous Waste Management	OEPA
Brenda Oswald - Environmental Engineer	U.S. EPA

**Facility Background**

Premix develops, formulates and manufactures thermoset compounds. The corporation was founded in 1958 and operations at the North Kingsville plant began prior to 1980. Premix products are used in various sectors such as the aerospace, automotive, appliance, electric and



construction industries. Premix's international customer base includes Boeing, Harley Davidson, Cummins, Trane, Dana, and Eaton. The North Kingsville facility houses corporate headquarters, compound manufacturing, compression and injection molding, and research and development for Premix. A second facility, located in Bay City, MI, is named Quantum Composites. High performance molding compound development, formulations, and compound manufacturing occur at this site.

#### Introductory Conference

The inspectors, Robert Almquist and Brenda Oswald, arrived at the facility at approximately 9:30am. The weather was overcast with occasional rains and the temperature was between 65° and 70°F. The inspectors signed in the logbook with a written stipulation that disagreeing to the company policy of confidentiality. Facility personnel, Kenna Coltman and Ken Lazo, met the inspectors at the front lobby where the inspectors showed identification and exchanged business cards with Ms. Coltman and Mr. Lazo. In a conference room, the group discussed Premix's hazardous waste generation and handling procedures. John Tackett joined the conversation before taking the group on a plant tour.

The hazardous waste produced on site consists of resins, paints, thickeners, and solvents, and all are stored in 55 gallon drums. Solvent contaminated rags are incinerated and cannot be laundered because of the thick consistency of the paste picked up on the rags. Organic peroxides may also be scrapped for contamination, expired shelf life, or because the type is not known. All waste paste in the facility is combined as a single type for polymerization treatment. The flammable waste paste drums are placed in one of two outdoor metal enclosures (See Picture 1, Appendix A), and the drums are equipped with band heaters to initiate the polymerization. The paste solidifies within 24 hours eliminating its hazardous ignitability characteristic. The drums are then sent as non-hazardous waste to a solid waste landfill. The drums are tested monthly by drilling a core into the hardened material in order to make sure that no liquid is present. Also, an evaluation is performed annually to ensure no change in the waste constitution. The waste paste that does not get polymerized is classified as D001 and sent as hazardous waste to Chemical Solvents, Inc (CSI).

Premix holds an air Permit to Install for the waste treatment units, which covers the venting system. The permit allows a maximum treatment of 1350 pounds per day per unit and states that the containers, doors and openings, other than the make-up air inflow vents, must be closed during treatment. The permit also has record-keeping requirements.

Ethyl acetate is treated as a hazardous waste along with any waste mixed with it. SP-298 is a hydrocarbon-based solvent that has a flash point above 140°F, but is sometimes accidentally mixed with ethyl acetate in parts washer cleanouts in the Pipe and Pump Cleaning Room. The resulting mixture is referred to as "SP-298 +," which is sent for fuel blending and is treated at CSI as hazardous waste. Other spent ethyl acetate from machine clean-outs is sent to CSI for

recovery. Premix has developed a color-coding method to prevent unintentional mixing of ethyl acetate with any other solvents so as to reduce the amount of hazardous waste produced.

When the machinery is cleaned out for a color change, plastic is used to line the floor to catch resin that drips out of the open pipes. Drum liners, gloves and other debris become contaminated with ignitable paste and all are treated as hazardous waste.

Fluorescent bulbs (taken by Air Cycle, IN) and batteries are treated as universal waste. Air Cycle also takes computer equipment and other light bulbs.

The facility no longer houses any paint lines or bake ovens. The old paint room is now used as a storage area for molds.

#### Facility Tour

The tour began in the Molding Division at the southwest end of the plant. Specially formulated fiberglass materials, which are processed in the Compound Division, are molded into high strength, light-weight items such as firefighter helmets. One drum was held in a metal storage room in this division. It contained hydrocarbon-based solvents from the machine room. The drum was closed and labeled. Further north along the west wall, was an area set aside for fire protection equipment including a small vehicle able to transport fire suppressant foam to the main indoor 90 day storage area and outside to the waste polymerization unit and second main 90 day storage area.

The Compound Division is the northern sector of the facility. Near the south wall of this section was a drum of waste ethyl acetate that was labeled, dated from 03/26/04, and treated as a 90 day area with weekly inspections and a spill kit. Because this drum fills up slowly, the inspectors suggested making it a satellite drum as it is near the point of waste generation and under the control of the operator.

Upstairs on a mixing platform for the different paste formulations, another small 90 day area with 3 drums was positioned next to a tank washer. All drums were closed, labeled with a description of the material and the words "Hazardous Waste," and dated as 5/20/04, 6/08/04, and 4/16/04. A spill kit is next to the drums as well. Approximately 20 feet from these three drums was a satellite container holding waste polyester resins labeled as hazardous waste and closed. The tank washer is approximately 6 feet square. Premix holds a Permit to Install for daily emissions tracking even though it is classified as an insignificant emissions source. The solvent used in the tank washer is non-hazardous SP-298.

Downstairs, on the main floor, is another small 90 day area with 2 drums. A container of waste ethyl acetate was closed, labeled, and dated as 5/21/04. The second drum containing waste polyester pastes was closed, labeled, and dated 6/09/04. A spill kit is located nearby.

The main indoor 90 day storage area lies to the east of the sheet molding compound area and the bulk molding compound area. Sheet molding compound is used for compression molds, whereas bulk molding compound is generally used for injection molding. An emergency containment cabinet is located by the 90 day area in which a drum in distress may be placed and a fire suppressant from the vehicle mentioned previously may be pumped in to diminish the ignitability hazard. At the time of the inspection, 10 drums were in the area. One drum of waste resin with debris was positioned in the compactor and was dated 6/09/04. Two drums contained non-hazardous materials: waste thickener, dated 6/03/04, and used oil. All seven other drums were labeled with a description of the waste and the words "Hazardous Waste," closed, and dated within 90 days of the inspection. Inspections are performed weekly on all drums in the facility. Spill kits are located nearby.

South of the 90 day area is a quality control (QC) lab. Lab pack waste is kept in a drum that is removed every 90 days. Most waste is produced from glass washing with a solvent called ES 2-173. Prior practice involved using a giant bath bin for washing, which has now been reduced to individual covered washing units in order to reduce air emissions.

The pipe and pump cleaning room is behind (east of) the main 90 day storage area. Pipes and pumps are disassembled from the process machinery when colors and paste consistencies change between different products. The equipment is then rinsed in parts washers using either SP-298 or ethyl acetate. SP-298 waste can be disposed of as non-hazardous waste because of its high flash point. The two solvent wastes are kept in separate drums, but are accidentally mixed at times.

In the bulk molding compound area, two satellite drums are labeled and closed. The mixers and extruders in the area are all covered under air permits.

To the east of the building is an outdoor 90 day storage shed. This shed houses the polymerization waste treatment units, and the drums which contained the polymerized material. Forty-eight drums of non-hazardous polymerized material were being held in the shed at the time of the inspection. A housekeeping station with brooms and shovels is located on the back wall of the shed along with spill kits. Nine drums of hazardous waste were also in this shelter. Seven drums contained cleanup material from a vinyl toluene spill and were dated from 5/04/04. Two other drums, one labeled as waste hydranol (sp?), and the other as waste pyridine, were closed and dated from 4/05/04.

On the northeast end of the property is a separate brick building that contains organic peroxides. As strong oxidizers, the materials are kept at a distance from the facility.

In the supply area, Ms. Colman explained that the special drums in which pigment is received, are now being replaced by uncertified drums that can be reused for waste right away. Premix saves some resources by reusing these drums rather than reconditioning the old ones or buying new ones for waste.

The inspection tour concluded at this time.

40 CFR § 265 Subparts AA, BB, and CC

This facility is exempt from RCRA air emissions regulations of 40 CFR § 265, Subparts AA, and BB. Subpart AA does not apply because the facility does not have any process vents associated with distillation, fractionation, thin film evaporation, solvent extraction, or air stripping units. Subpart BB is not applicable because the facility does not have equipment (pumps, compressors, pressure release devices, sampling connections, open-ended valves and lines, valves, flanges or connectors) associated with units as delineated in 40 CFR § 265.1050(b)(1)-(3). Subpart CC does apply to this generator. All containers in 90 day storage areas, however, were properly closed and inspected.

INTERIM STATUS FACILITIES ORGANIC AIR  
EMISSION STANDARDS FOR PROCESS VENTS

AA

Facility's Name PREMIX  
Date 6-10-04 ID# 040 004 200 044

Note: Use of the words "process vents" means process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 ppmw (time weight annual average basis).

Note: Total Organic Emissions shall be abbreviated to TOE

(rev. 7/3/96 - EAB-MDEQ)

NI - not inspected

N/A - not applicable

DO NOT HAVE PROCESS VENTS  
ASSOCIATED WITH THE ABOVE.

YES NO NI N/A

APPLICABILITY (40 CFR 265.1030)

1. Manage hazardous waste w/ organic concentrations of at least 10 ppmw in units w/ process vents? (265.1030(b)) DAE NO

IF YES

a) Are the units subject to the permitting requirements under part 270? (265.1030(b)(1)) DAE \*

OR

b) Are there hazardous waste recycling units with process vents that are located at the facility that is otherwise subject to the permitting requirements? (265.1030(b)(2)) DAE \*

\* If the answers to the above questions is no the following regulations do not apply, except you must verify the facility waste has less than 10 ppmw: see 40 CFR 265.1034(d) and 40 CFR 265.1034(e) and this information must be recorded in a log: 40 CFR 265.1035(f).

STANDARDS: PROCESS VENTS (40 CFR 265.1032)

Note: A determination of vent emissions may be based on engineering calculations or tests (265.1032(c)) with any performance tests meeting the requirements of 265.1034(c).

2. Has the owner/operator of a facility with process vents:  
a) Reduced TOE from all affected process vents < 1.4 kg/h (3 lb/h) & 2.8 mg/yr (3.1 tons/yr)? (265.1032(a)(1)) DAE [ ] NI N/A

OR

b) Reduced, by use of a control device (that meets the requirements of 265.1033) the TOE from all affected process vents by 95 weight percent? (265.1032(a)(2)) DAE [ ] NI N/A

Note: If the process vents emit below the limits with out an add-on control device the facility the only additional requirement is 265.1035(f)

STANDARDS: CLOSED-VENT SYSTEMS AND CONTROL DEVICES (40 CFR 265.1033)

3. Was a closed-vent system and control device installed by 12/21/90 or as per an implementation schedule with a completion date as soon as possible but no later than June 21, 1992? (265.1033(a)(2)) DAE [ ] NI N/A

4. If the owner/operator has installed a closed-vent system and control device by their effective date, was: (265.1033(a)(1))

a) Control device involving vapor recovery designed/operated to recover organic vapors vented to it w/ an efficiency of 95 weight percent or greater? (265.1033(b)) (N/A if TOE for all affected process vents can be attained at an efficiency less than 95 weight percent?) DAE [ ] NI N/A

b) Enclosed combustion device designed and operated to reduce organic emissions vented to it by 95 weight percent or greater to: (265.1033(c))

i) Achieve a total organic compound concentration of 20 ppmv? DAE [ ] NI N/A

OR

ii) Provide minimum resident time of 0.50 seconds at minimum temp. of 760 degrees C? (265.1033(c)) DAE [ ] NI N/A

c) A flare:

i) Designed/operated w/ no visible emissions except periods not to exceed total of 5 minutes during any 2 consecutive hours? (255.1033(d)(1)) DAE [ ] NI N/A

ii) Operated with a flame present at all times? (265.1033(d)(2)) DAE [ ] NI N/A



		YES	NO	NI	N/A
iii) Used only if: (265.1033(d)(3))					
a) Net heating value of gas being combusted is $\geq 300$ Btu/scf if flare is steam or air assisted?		DAE	<input type="checkbox"/>	NI	N/A

OR

b) If the net heating value of the gas being combusted is 200 Btu/scf. or greater if the flare is non-assisted?		DAE	<input type="checkbox"/>	NI	N/A
d) Was the steam-assisted or non-assisted flare designed and operated with an exit velocity: (265.1033(d)(4)(I-iii))					
i) Less than 60 ft/s? Except if,		DAE	<input type="checkbox"/>	NI	N/A
ii) $\geq 60$ ft/s but $< 400$ ft/s? (Only allowed if net heating value of gas is greater than 1000 Btu/scf)		DAE	<input type="checkbox"/>	NI	N/A
iii) Less than the velocity, Vmax and less than 400 ft/s?		DAE	<input type="checkbox"/>	NI	N/A
e) Was air-assisted flare designed and operated with an exit velocity less than the velocity Vmax? (265.1033(d)(5))		DAE	<input type="checkbox"/>	NI	N/A

Note: The formulas needed to determine #4.d & #4.e. are found in 265.1033(e)(2-5).

f) For a flare was:					
i) Method 22 used to determine compliance with visible emissions? (265.1033(e)(1))		DAE	co rep. said <input type="checkbox"/>	NI	N/A
ii) The net heating value of the gas being combusted calculated correctly? (265.1033(e)(2))		DAE	co rep. said <input type="checkbox"/>	NI	N/A
iii) The actual exit velocity correctly determined? (265.1033(e)(3))		DAE	co rep. said <input type="checkbox"/>	NI	N/A
iv) The maximum allowed velocity calculated correctly? (265.1033(e)(4))		DAE	co rep. said <input type="checkbox"/>	NI	N/A
v) The maximum allowed velocity for air assisted flare calculated correctly? (265.1033(e)(5))		DAE	co rep. said <input type="checkbox"/>	NI	N/A
5. Did the owner/operator monitor and inspect each control device required to ensure proper operation and maintenance by: (265.1033(f)(1))					
a) Installing/calibrating/maintaining/operating flow indicator w/ record of vent stream flow at least once per hour?		DAE	<input type="checkbox"/>	NI	N/A
b) Installing/calibrating/maintaining/operating device to continuously monitor control devices as specified below: (265.1033(f)(2))					
i) Thermal vapor incinerator, a temperature monitoring device equipped with a continuous recorder?		DAE	<input type="checkbox"/>	NI	N/A
ii) Catalytic vapor incinerator, a temperature monitoring device equipped with a continuous recorder?		DAE	<input type="checkbox"/>	NI	N/A
iii) Flare/heat sensing monitoring device have a continuous recorder giving continuous ignition pilot flame?		DAE	<input type="checkbox"/>	NI	N/A
iv) Boiler/process heater w/ design heat input capacity $< 44$ MW, a temp. monitoring device w/ a continuous recorder?		DAE	<input type="checkbox"/>	NI	N/A
v) Boiler/process heater w/ design heat input capacity $\geq 44$ MW, a monitoring device w/ a continuous recorder to measure parameter(s) that indicates good combustion operating practices?		DAE	<input type="checkbox"/>	NI	N/A
vi) For a condenser, either: (265.1033(f)(2)(vi))					
a) Monitoring device w/ continuous recorder for concentration of organic compounds in exhaust vent stream?		DAE	<input type="checkbox"/>	NI	N/A

OR

b) A temperature monitor device equipped with continuous recorder?		DAE	<input type="checkbox"/>	NI	N/A
vii) A carbon adsorption system that regenerates the carbon bed directly in the control device, either: (265.1033(f)(2)(vi))					
a) Monitoring device w/ continuous recorder for concentration of organic compounds in exhaust vent stream?		DAE	<input type="checkbox"/>	NI	N/A

OR

		YES NO NI N/A
b) Monitor device w/ continuous recorder to measure parameter that indicates the carbon bed is regenerated on a regular predetermined time cycle?	DAE	<input type="checkbox"/> NI N/A

AND

c) Replaces existing carbon w/ fresh at pre-set interval no longer than carbon service life? (265.1033(g))	DAE	<input type="checkbox"/> NI N/A
viii) If using a carbon adsorption system that does not regenerate carbon bed on-site in the control device, the existing carbon will be replaced w/ fresh carbon on a regular basis by either: (265.1033(h)(1-2))		
a) Monitoring the concentration level of the organic compounds regularly and replace the carbon with fresh immediately after break-through?		
i) Monitoring daily?	DAE	<input type="checkbox"/> NI N/A
ii) Monitoring at interval no greater than 20% of time required to consume total carbon working capacity?	DAE	<input type="checkbox"/> NI N/A
b) Replace the existing carbon with fresh at regular, predetermined intervals?	DAE	<input type="checkbox"/> NI N/A
c) Inspecting readings from (except 265.1033(h)) monitoring device(s) at least once each operating day? (265.1033(f)(3))	DAE	<input type="checkbox"/> NI N/A

AND

d) If needed, implement necessary corrective measures to ensure control devices work? (265.1033(f)(3))	DAE	<input type="checkbox"/> NI N/A
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Note: An alternative operational or process parameter may be monitored see 40 CFR 265.1033(l).

6. The closed-vent system(s):		
a) Was it designed for and operated with no visible emissions? (265.1033(j)(1))	DAE	<input type="checkbox"/> NI N/A
b) Have initial leak detection monitoring conducted: (265.1033(j)(2))		
i) By date facility becomes subject to these regulations?	DAE	<input type="checkbox"/> NI N/A
ii) Annually thereafter?	DAE	<input type="checkbox"/> NI N/A
c) Control detectable emissions (> 500 ppm) as soon as possible but: (265.1033(j)(3-4))		
i) No later than 15 calendar days after detected?	DAE	<input type="checkbox"/> NI N/A
ii) First attempt at repair made no later than 5 calendar days after detection?	DAE	<input type="checkbox"/> NI N/A
7. Were closed-vent systems and control devices operated at all times when emissions may be vented to them? (265.1033(k))	DAE	co. rep said <input type="checkbox"/> NI N/A

TEST METHODS AND PROCEDURE (40 CFR 265.1034)

8. Were correct test methods and procedures used? (265.1034(a))		
a) For a closed-vent system tested for no detectable emissions? (265.1034(b)(1-7))	DAE	<input type="checkbox"/> NI N/A
b) To determine compliance with the 10 ppmw and with the total organic compound limit (95%)? (265.1034(c))	DAE	<input type="checkbox"/> NI N/A
9. Did the facility determine that the process vents are not subject to the requirements of this subpart? If so, did the owner/operator make an initial determination that the time-weighted annual average total organic concentration managed by the unit is less than 10 ppmw by: (265.1034(d))		
a) Direct measurement? (265.1034(d)(1))	DAE	<input type="checkbox"/> NI N/A
b) Using knowledge? (265.1034(d)(2))	DAE	<input type="checkbox"/> NI N/A
10. Was the determination that distillation, fractionation, thin-film evaporation, solvent extraction or air or stream stripping operations manage hazardous wastes time-weighted annual average total organic concentration is less than 10 ppmw made as follows: (265.1034(e))		
i) By date the facility is first subject to the regulations or the date the waste is first managed, whichever is first?	DAE	<input type="checkbox"/> NI N/A
ii) For continuously generated waste annually?	DAE	<input type="checkbox"/> NI N/A

YES	NO	NI	N/A
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OR

c) When there is change in way waste being managed or in the process that generates the waste? (265.1034(e)(3))	DAE	<input type="checkbox"/>	NI	N/A
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**RECORDKEEPING REQUIREMENTS (40 CFR 265.1035)**

Note: If there is more than one managed unit the facility can use one recordkeeping system. (265.111035(a)(2))

11. Did the owner/operator record the following information in the facility operating record: (265.1035(b))				
a) The schedule and the rational, if the facility needed to develop an implementation schedule? (265.1035(b)(1))	DAE	<input type="checkbox"/>	NI	N/A
b) Up-to-date process vent documentation?				
i) Information & data: (265.1035(b)(2)(I))				
a) Identifying all effected process vents?	DAE	<input type="checkbox"/>	NI	N/A
b) Annual throughput and operating hours of each effected unit?	DAE	<input type="checkbox"/>	NI	N/A
c) Estimated emission rates for each effected vent & for overall facility?	DAE	<input type="checkbox"/>	NI	N/A
d) Location of each effected vent on plot plan?	DAE	<input type="checkbox"/>	NI	N/A
ii) Information and data supporting determinations of vent emissions and emission reductions achieved by add-on control devices based on engineering calculations or source tests? (265.1035(b)(2)(ii))	DAE	<input type="checkbox"/>	NI	N/A
c) If tests were used to determine organic removal efficiency or total organic compound concentration was there a performance test plan, which include: (265.1035(b)(3)(ii)(A-E))				
i) Engineering description of closed vent system and control device including:				
a) Manufacture name and model #?	DAE	<input type="checkbox"/>	NI	N/A
b) Type of control device?	DAE	<input type="checkbox"/>	NI	N/A
c) Dimensions?	DAE	<input type="checkbox"/>	NI	N/A
d) Capacity?	DAE	<input type="checkbox"/>	NI	N/A
e) Construction materials?	DAE	<input type="checkbox"/>	NI	N/A
ii) Description of sampling and monitoring procedures, including: (265.1035(b)(3)(iii))				
a) Location?	DAE	<input type="checkbox"/>	NI	N/A
b) Equipment?	DAE	<input type="checkbox"/>	NI	N/A
c) Frequency?	DAE	<input type="checkbox"/>	NI	N/A
d) Procedures?	DAE	<input type="checkbox"/>	NI	N/A
d) Documentation on the closed-vent systems and the control devices required in 265.1033, specifically: (265.1035(b)(4))				
i) List of all information, references and sources used to prepare documentation? (265.1035(b)(4)(I))	DAE	<input type="checkbox"/>	NI	N/A
ii) Records with dates of compliance tests?	DAE	<input type="checkbox"/>	NI	N/A
iii) Engineering calculations for design analysis/specifications/drawings/schematics/piping/instrument diagrams include: (265.1035(b)(4)(iii))				
a) Thermal vapor incinerators, consider vent stream composition/constituent composition/flow rate. Included design minimum, average temperature & residence time in the combustion zone? (265.1035(b)(4)(iii)(A))	DAE	<input type="checkbox"/>	NI	N/A
b) Catalytic vapor incinerators, consider vent stream composition/constituent composition/flow rate. Include design minimum & average temperature across the catalyst bed inlet and outlet? (265.1035(b)(4)(iii)(B))	DAE	<input type="checkbox"/>	NI	N/A
c) Boiler or process heater, consider vent stream composition/constituent composition/flow rate. Include design minimum & average flame zone temperatures, combustion zone residence time & where vent system is introduced? (265.1035(b)(4)(iii)(C))	DAE	<input type="checkbox"/>	NI	N/A
d) Flare, consider vent stream composition/constituent composition/flow rate. Design analysis requirements are in 265.1033(d)? (265.1035(b)(4)(iii)(D))	DAE	<input type="checkbox"/>	NI	N/A

		YES	NO	NI	N/A
e)	Condenser, consider vent stream composition/constituent composition/flow rate/relative humidity & temp. Include design outlet organic compound concentration level, design average temp. of the exhaust vent stream, and the design average temp. of the coolant fluid at the condenser outlet and inlet? (265.1035(b)(4)(iii)(E)) DAE	<input type="checkbox"/>		NI	N/A
f)	Carbon adsorption system that regenerates bed on-site in the control device, consider the vent stream composition/constituent concentrations/flow rate/relative humidity/temperature. Include design exhaust vent stream organic compound concentration level/number & capacity of carbon beds/type & capacity of activated carbon/total stream flow/bed steaming/cooling/drying cycles/temp. regeneration/time of regeneration/service life? (265.1035(b)(4)(iii)(F)) DAE	<input type="checkbox"/>		NI	N/A
g)	Carbon adsorption system that does not regenerate on-site in a control device, consider the vent stream composition/constituent concentrations/flow rate/relative humidity/temperature. Include the design outlet organic concentration level/capacity of the bed/type & capacity of the carbon in the bed/replacement interval? (265.1035(b)(4)(iii)(G)) DAE	<input type="checkbox"/>		NI	N/A
e)	A statement signed/dated by the owner/operator certifying that the operating parameters used in the design analysis reasonably represent the conditions that exist when the hazardous waste management unit is or would be operating at the highest load or capacity level reasonably expected to occur? (265.1035(b)(iv)) DAE	<input type="checkbox"/>		NI	N/A
f)	A statement signed/dated by the owner/operator certifying that the control device is designed to operate at an efficiency of ≥ 95% (are alternatives)? A statement from the device manufacture or vendor certifying that the control equipment meets the design specifications will suffice? (265.1035(b)(v)) DAE	<input type="checkbox"/>		NI	N/A
g)	If test performance tests are used to demonstrate compliance, all test results? (265.1035(b)(vi)) DAE	<input type="checkbox"/>		NI	N/A
h) Design documentation & monitoring/operating & inspection information for each closed-vent system/control device recorded, kept up-to-date and including: (265.1035(c))					
i)	Description and date of each modification? (265.1035(c)(1)) DAE	<input type="checkbox"/>		NI	N/A
ii)	Id operating parameters/describe monitoring devices/diagram monitoring sensor locations? (265.1035(c)(2)) DAE	<input type="checkbox"/>		NI	N/A
iii)	Monitoring/operating & inspection information required in 265.1033(f-j)? (265.1035(c)(3)) DAE	<input type="checkbox"/>		NI	N/A
iv)	Date, time and duration when monitoring values exceed the value established? (265.1035(c)(4)) DAE	<input type="checkbox"/>		NI	N/A
v)	Explanation for each period the control device operating parameter exceeded the design value & the measures implemented to correct the control device? 265.1035(c)(5) DAE	<input type="checkbox"/>		NI	N/A
vi)	Carbon adsorption systems where the carbon is regenerated in the control device or a system that changes the carbon at a regular, predetermined interval give the date when existing carbon is replaced? (265.1035(c)(6)) DAE	<input type="checkbox"/>		NI	N/A
vii) For a carbon adsorption system that changes the carbon at breakthrough have a log that records: (265.1035(c)(7)(I-ii))					
a)	Date and time of breakthrough and the monitoring device reading? DAE	<input type="checkbox"/>		NI	N/A
b)	Date when existing carbon is replaced with fresh carbon? DAE	<input type="checkbox"/>		NI	N/A
viii)	Date of control device start up and shut down? (265.1035(c)(8)) DAE	<input type="checkbox"/>		NI	N/A
i)	Control device other than thermal or catalytic vapor incinerator/flare/boiler/process heater/condenser/carbon adsorption bed, the monitoring/inspection information indicating proper operation & maintenance? (265.1035(e)) DAE	<input type="checkbox"/>		NI	N/A
j)	Up-to-date information/data used to determine if a process vent falls under (265.1032) & supporting documentation (265.1034(d)(2)) when knowledge of the nature of hazardous waste stream or process is used? (265.1035(f)) DAE	<input type="checkbox"/>		NI	N/A
12. Are records of monitoring, operating and inspection information kept at least 3 years? (265.1035(d)) DAE		<input type="checkbox"/>		NI	N/A

Facility's Name PREMIX  
Date 6-10-04 ID# OH0 004 200 044

Use of the words "process vents" means process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 ppmw (time weight annual average basis).

Note: Total Organic Emissions shall be abbreviated to TOE

Note: Equipment with closed-vent systems and control devices shall comply with the provisions of section 265.1033.

(rev. 4/25/97 [2/00.mw] - EAB-MDEQ)

NI - not inspected

N/A - not applicable

YES NO NI N/A

**APPLICABILITY (40 CFR 265.1050)**

1. If the equipment contains or contacts hazardous waste w/ organic concentrations of at least 10 percent by weight:

a) Are the units subject to the permitting requirements of part 270? (265.1050(b)(1))

DAE

No \*

OR

b) Are there hazardous waste recycling units located at the facility that are otherwise subject to the permitting requirements? (265.1050(b)(2))

DAE

No \*

\* If the answers to the above questions are no the following regulations do not apply.

**STANDARDS: PUMPS IN LIGHT LIQUID (40 CFR 265.1052)**

Note: Delays in repair are allowed see 265.1059 (#37)

Note: Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-1)) (#41)

2. Pump equipped w/ dual mechanical seal system that includes a barrier fluid system? If yes, its exempt from monthly monitoring (#5) and visual inspections (#6) if: (265.1052(d))

NI N/A

a) Each dual mechanical seal system is:

i) Operated with a barrier fluid with pressure greater than the pump stuffing box pressure. (265.1052(d)(1)(i))

DAE

☐

NI N/A

OR

ii) Has a barrier fluid degassing reservoir connected by closed-loop to a control device. (265.1052(d)(1)(ii))

DAE

☐

NI N/A

OR

iii) System that purges the barrier fluid into a hazardous waste stream w/no detectable emissions? (265.1052(d)(1)(iii))

☐

NI N/A

b) Barrier fluid is not a hazardous waste w/ organic concentrations 10% or greater by weight. (265.1052(d)(2))

DAE

☐

NI N/A

c) Each barrier fluid system equipped w/ a sensor to detect failure of the seal/barrier fluid system. (265.1052(d)(3))

DAE

☐

NI N/A

d) Each calendar week pump has visual inspection for signs of liquids dripping from pump seals. (265.1052(d)(4))

DAE

☐

NI N/A

e) Each sensor is checked: (265.1052(d)(5)(i))

i) Daily.

DAE

☐

NI N/A

OR

ii) Equipped with audible alarm that is checked monthly to see if working.

DAE

☐

NI N/A

f) Owner/operator has determined a criteria indicating failure of the seal/barrier fluid system. (265.1052(d)(5)(ii))

DAE

☐

NI N/A

g) Indications of liquids dripping from pump seal/sensor means failure of seal/barrier fluid system & a leak has been detected: (265.1052(d)(6)(i))

i) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(d)(6)(ii))

DAE

☐

NI N/A

ii) A first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1052(d)(6)(iii))

DAE

☐

NI N/A

The pump designed as in 264.1064(g)(2) for no detectable emissions as indicated by an instrument reading of <500 ppm above background? Yes, pump exempt from monthly monitoring (#5), visual monitoring (#6), repairs (#7a & #7b) and barrier fluid system (#2) if: (265.1052(e))

NI N/A

a) It does not have an externally actuated shaft penetrating the pump housing. (265.1052(e)(1))

DAE

☐

NI N/A

		YES	NO	NI	N/A
b)	It operates with no detectable emissions as indicated w/ emission reading of <500 ppm. (265.1052(e)(2))	DAE	<input type="checkbox"/>	NI	N/A
c)	Is tested for compliance initially, annually and when requested by Regional Administrator. (265.1052(e)(3))	DAE	<input type="checkbox"/>	NI	N/A
4.	Is the pump equipped with a closed-vent system capable of capturing and transporting any leakage from seal(s) to the control device? If yes, the pump is exempt from monthly monitoring (#5), visual monitoring (#6), repairs (#7a & #7b), barrier fluid system (#2) and no detectable emission (#3). (265.1052(f))	DAE	<input type="checkbox"/>	NI	N/A
5.	Is each pump in light liquid service monitored monthly to detect leaks? (265.1052(a)(1))	DAE	<input type="checkbox"/>	NI	N/A
6.	Does each pump in light liquid service have a visual inspection each calendar week for indications of liquid dripping? (265.1052(a)(2))	DAE	<input type="checkbox"/>	NI	N/A
7.	Was an instrument reading of 10,000 ppm or greater measured or were there are any indications of liquids dripping from the pump seal? If yes, a leak is detected and:	DAE	<input type="checkbox"/>	NI	N/A
a)	Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(c)(1))	DAE	<input type="checkbox"/>	NI	N/A
b)	Was a first attempt at repair made no later than 5 calendar days after leak is detected? (265.1052(c)(2))	DAE	<input type="checkbox"/>	NI	N/A

### STANDARDS: COMPRESSORS (40 CFR 265.1053)

NOTE: Delays in repair are allowed see 265.1059 (#37)

8.	Is the compressor designed as described in 265.1064(g)(2), for no detectable emissions indicated by instrument reading of <500 ppm above background? If yes the compressor is exempt from seal system and operation (#10-11), barrier fluid concentration (#12), barrier system sensor(#13-14), criteria for failure (#15), leak detection/repair (#16) and closed-vent (#9). (265.1053(i))	DAE	<input type="checkbox"/>	NI	N/A
9.	Is the compressor equipped with a closed-vent system capable of capturing and transporting leakage from the seal(s) to a control device in compliance w/ 265.1060? If yes, the compressor is exempt from seal system (#10) and seal system operation (#11). (265.1053(h))	DAE	<input type="checkbox"/>	NI	N/A
10.	Each compressor equipped w/ seal system that has barrier fluid system that prevents leakage of TOE? (265.1053(a))	DAE	<input type="checkbox"/>	NI	N/A
11.	Is each compressor seal system: (265.1053(b))				
a)	Operated with the barriers fluid at a greater pressure than the stuffing box pressure? (265.1053(b)(1))	DAE	<input type="checkbox"/>	NI	N/A

OR

b)	Equipped with a barrier fluid system connected by a closed-vent system to a control device? (265.1053(b)(2))	DAE	<input type="checkbox"/>	NI	N/A
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OR

c)	Equipped with a system that purges the barrier fluid system with no detectable emissions? (265.1053(b)(3))	DAE	<input type="checkbox"/>	NI	N/A
12.	Is the barrier fluid system a hazardous waste w/ an organic concentration of 10% or greater by weight? (265.1053(c))	DAE	<input type="checkbox"/>	NI	N/A
13.	Each barrier system equipped w/ a sensor to detect failure of the seal/barrier fluid system? (265.1053(d))	DAE	<input type="checkbox"/>	NI	N/A
14.	Is each barrier system sensor checked: (265.1053(e)(1))				
a)	Daily?	DAE	<input type="checkbox"/>	NI	N/A

OR

b)	Equipped with audible alarm that is checked monthly to see if working?	DAE	<input type="checkbox"/>	NI	N/A
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UNLESS

c)	The compressor is located at an unmanned plant then is the sensor checked daily?	DAE	<input type="checkbox"/>	NI	N/A
15.	Has the owner/operator determined a criterion to indicate failure of the seal/barrier fluid system? (265.1053(e)(2))	DAE	<input type="checkbox"/>	NI	N/A
16.	Did the sensor indicates failure of the seal/barrier fluid system? If yes, a leak is detected and: (265.1053(f))	DAE	<input type="checkbox"/>	NI	N/A



		YES	NO	NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(g)(1))	DAE	<input type="checkbox"/>		NI	N/A
b) Was a first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1052(g)(2))	DAE	<input type="checkbox"/>		NI	N/A

**STANDARDS: PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE (40 CFR 265.1054)**

NOTE: Delays in repair are allowed see 265.1059 (#37)

17. Is the pressure relief device equipped with a closed-vent system capable of capturing and transporting leakage to a control devices specified in 265.1060? If yes, the device is exempt from relief device monitored for no detectable emissions (#18), specifications to reset device and time frame (#19 & #20). (265.1054(c))	DAE			NI	N/A
18. Pressure relief devices in gas/vapor service operated w/ no detectable emissions indicated by an instrument reading of < 500 ppm above background, except during pressure releases? (265.1054(a))	DAE	<input type="checkbox"/>		NI	N/A
19. After a pressure release, was the device returned to a condition of no detectable emissions indicated by an instrument reading of < 500 ppm above background, as soon as practical but no later than 5 calendar days? (265.1054(b)(1))	DAE	<input type="checkbox"/>		NI	N/A
20. No later than 5 calendar days after a pressure release, is the pressure relief device monitored to confirm no detectable emissions indicated by an instrument reading of < 500 ppm above background,? (265.1054(b)(2))	DAE	<input type="checkbox"/>		NI	N/A

**STANDARDS: SAMPLING CONNECTING SYSTEMS (40 CFR 265.1055)**

21. Is the sampling system <i>in situ</i> ? If yes, the system isn't required to have closed-vent or closed-purge system (#22 & #23). (265.1055(c))				NI	N/A
22. Is each sampling connection system equipped with a closed-purge system or closed-vent system? (265.1055(a))		<input type="checkbox"/>		NI	N/A
23. Does each closed-purge or closed-vent system: (265.1055(b))					
a) Return purged hazardous waste stream directly to hazardous waste management process line w/ no detectable emissions? (265.1055(b)(1))	DAE	<input type="checkbox"/>		NI	N/A

OR

b) Collect and recycle the purged hazardous waste stream with no detectable emissions? (265.1055(b)(2))	DAE	<input type="checkbox"/>		NI	N/A
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OR

c) Designed/operated to capture/transport all purged hazardous waste stream to a control device? (265.1055(b)(3))	DAE	<input type="checkbox"/>		NI	N/A
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**STANDARDS: OPEN-ENDED VALVES OR LINES (40 CFR 265.1056)**

Note: Delays in repair are allowed see 265.1059 (#37)

Note: Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-1)) (#41)

24. Is each open-ended valve or line equipped with a cap, blind flange, plug or second valve? (265.1056(a)(1))	DAE	<input type="checkbox"/>		NI	N/A
25. Cap/blind flange/plug/second valve always seal open end except when waste must flow through? (265.1056(a)(2))	DAE	<input type="checkbox"/>		NI	N/A
26. If using a second valve, is the first valve closed before the second? (265.1056(b))	DAE	<input type="checkbox"/>		NI	N/A
27. If a double block and bleed system is used and the bleed line/valve stays open during venting, is the line between the block valves have cap/blind flange/plug/second valve and sealed at all other times? (265.1056(c))	DAE	<input type="checkbox"/>		NI	N/A

**STANDARDS: VALVES IN GAS/VAPOR SERVICE OR IN LIGHT LIQUID SERVICE (40 CFR 265.1057)**

Note: There are alternate standards for valves in gas/vapor or light liquid service where owners/operators may elect to have all valves within a hazardous waste management unit comply with alternative standards which: (1) allows no greater than 2% of the valves to leak. (265.1061(a-d) and (2) allows for skip period leak detection and repair. (265.1062(a-b))

Note: Delays in repair are allowed see 265.1059 (#37)

Valve designated as an unsafe-to-monitor valve as described in 265.1064(h)(1). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(g))	DAE			NI	N/A
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	YES	NO	NI	N/A
a) The owner/operator of the valve determines that the valve would be unsafe to monitor because monitoring personnel would be exposed to an immediate danger. (265.1057(g)(1))	DAE	<input type="checkbox"/>	NI	N/A
b) The owner/operator of the valve adheres to a written plan that requires monitoring of the valve as often as possible during safe-to-monitor times. (265.1057(g)(2))	DAE	<input type="checkbox"/>	NI	N/A
29. Valve designated as a difficult to-monitor valve in 265.1064(h)(2). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(h))			NI	N/A
a) The owner/operator of the valve determines the valve cannot be monitored without elevating personnel more than 2 meters above a support surface. (265.1057(h)(1))	DAE	<input type="checkbox"/>	NI	N/A
b) Hazardous waste management unit where valve is located was in operation before 6/21/90. (265.1057(h)(2))	DAE	<input type="checkbox"/>	NI	N/A
c) Follow written plan that requires monitoring of valve at least once per calendar year. (265.1057(h)(3))	DAE	<input type="checkbox"/>	NI	N/A
30. Valve designated for no detectable emissions, as indicated by instrument reading of < 500 ppm above background, and described in 265.1064(g)(2). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(i))			NI	N/A
a) It has no external actuating mechanism in contact with the hazardous waste streams. (265.1057(i)(1))	DAE	<input type="checkbox"/>	NI	N/A
b) It is operated with emissions < 500 ppm above background. (265.1057(i)(2))	DAE	<input type="checkbox"/>	NI	N/A
c) It is tested for emissions initially and then annually. (265.1057(i)(3))	DAE	<input type="checkbox"/>	NI	N/A
31. Is each valve, other than unsafe or difficult-to-monitor or no detectable emissions (#28-30), in gas/vapor or light liquid service monitored monthly for leaks? (265.1057(a)) (exemptions 33 & 34)		<input type="checkbox"/>	NI	N/A

OR

32. Any valve for which a leak has not been detected for two successive months may be monitored the first month of every succeeding quarter, until a leak is detected? (265.1057(c)(1))		<input type="checkbox"/>	NI	N/A
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AND

33. If the monitoring was every quarter and a leak is detected was the monthly monitoring resumed until a leak was not detected for 2 consecutive months? (265.1057(c)(2))	DAE	<input type="checkbox"/>	NI	N/A
34. When a leak is detected, by an instrument reading of 10,000 ppm or greater: (265.1057(b)); (265.1057(d)(1))				
a) Was it repaired as soon as practicable but not later than 15 calendar days after detected? (265.1052(d)(1))	DAE	<input type="checkbox"/>	NI	N/A
b) Was a first attempt at repair made no later than 5 calendar days after leak is detected? (265.1052(d)(2))	DAE	<input type="checkbox"/>	NI	N/A
c) Was the first repair attempt include, but not limited to: (265.1057(e))				
i) Tightening of bonnet bolts?	DAE	<input type="checkbox"/>	NI	N/A
ii) Replacement of bonnet bolts?	DAE	<input type="checkbox"/>	NI	N/A
iii) Tightening of packing gland nuts?	DAE	<input type="checkbox"/>	NI	N/A
iv) Injection of lubricant into lubricating packing?	DAE	<input type="checkbox"/>	NI	N/A

### STANDARDS: PUMPS AND VALVES IN HEAVY LIQUID SERVICE, PRESSURE RELIEF DEVICES IN LIGHT LIQUID OR HEAVY LIQUID SERVICE AND FLANGES AND OTHER CONNECTORS (40 CFR 265.1058)

NOTE: Delays in repair are allowed see 265.1059 (#37)

35. Are pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service and flanges and other connectors monitored within 5 days if evidence of a potential leak is found by visual, audible, olfactory or other detection method? (265.1058(a))	DAE	<input type="checkbox"/>	NI	N/A
36. If a leak was detected, by an instrument reading of 10,000 ppm or greater: (265.1058(b))	DAE		NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1058(c)(1))	DAE	<input type="checkbox"/>	NI	N
b) Was a first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1058(c)(2))	DAE	<input type="checkbox"/>	NI	N/A

		YES	NO	NI	N/A
c) Was the first repair attempt include, but not limited to: (265.1058(d))					
i) Tightening of bonnet bolts?	DAE	<input type="checkbox"/>		NI	N/A
ii) Replacement of bonnet bolts?	DAE	<input type="checkbox"/>		NI	N/A
iii) Tightening of packing gland nuts?	DAE	<input type="checkbox"/>		NI	N/A
iv) Injection of lubricant into lubricating packing?	DAE	<input type="checkbox"/>		NI	N/A

**STANDARDS: DELAY OF REPAIR (40 CFR 265.1059)**

37. Was there a delay in repair of equipment for which leaks have been detected? If yes, the delay is allowed if:	DAE		NI	N/A
a) Was the repair technically infeasible without a shutdown of the hazardous waste management unit and did the repair occur before the end of the next shutdown? (265.1059(a))	DAE	<input type="checkbox"/>	NI	N/A
b) Was the equipment isolated from the hazardous waste management unit and the unit does not contain or contact hazardous waste with organic concentrations at least 10% by weight. (265.1059(b))	DAE	<input type="checkbox"/>	NI	N/A
38. Was there a delay in repair of a valve? If yes, the delay is allowed if:	DAE		NI	N/A
a) Determine emissions from purged material from immediate repair are greater than emissions resulting from a delay of the repair. (265.1059(c)(1))		<input type="checkbox"/>	NI	N/A
b) When repaired, the purged material is collected and destroyed or recovered in a control device. (265.1059(c)(2))		<input type="checkbox"/>	NI	N/A
39. Was there a delay in repair of a pump? If yes, the delay will be allowed if:	DAE		NI	N/A
a) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system. (265.1059(d)(1))	DAE	<input type="checkbox"/>	NI	N/A
b) Repair is completed as soon as practicable but within 6 months. (265.1059(d)(2))	DAE	<input type="checkbox"/>	NI	N/A
40. Was there a delay in repair of a valve beyond a hazardous waste management unit shutdown? If yes, the delay will be allowed until the next shutdown or longer if the shutdown is within 6 months if: (265.1059(e))	DAE		NI	N/A
a) The valve assembly replacement is necessary during shutdown.	DAE	<input type="checkbox"/>	NI	N/A
b) Valve assembly supplies have been depleted & supplies were sufficiently stocked before supplies were depleted.	DAE	<input type="checkbox"/>	NI	N/A

**TEST METHODS AND PROCEDURES (40 CFR 265.1063)**

41. Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-1))				
a) For leak detection monitoring? (265.1063(b))	DAE	<input type="checkbox"/>	NI	N/A
b) For 'no detectible' emissions determination? (265.1063(c))	DAE	<input type="checkbox"/>	NI	N/A
c) To determine if each piece of equipment contains or contacts a hazardous waste w/ organic concentrations $\geq$ 10% by weight? (265.1063(d))	DAE	<input type="checkbox"/>	NI	N/A
d) To determine if pumps or valves are in light liquid service? (265.1063(h))	DAE	<input type="checkbox"/>	NI	N/A
e) To determine if the control device achieved 95 weight percent organic emissions? (265.1063(i))	DAE	<input type="checkbox"/>	NI	N/A
42. Were samples used in determine the percent organic content representative of the highest TOC hazardous waste that is expected to be contained in or contact the equipment? (265.1063(g))	DAE	<input type="checkbox"/>	NI	N/A

**RECORDKEEPING REQUIREMENTS (40 CFR 265.1064)**

Note: Owners/operators with more than one hazardous waste management unit, subject to these regulations, may use one recordkeeping system if each unit is identified.

Did the owners/operators record the following information in the operating record for each piece of equipment subject to Subpart BB? (265.1064(b))

			YES	NO	NI	N/A
a)	Equipment identification number and hazardous waste management unit identification? (265.1064(b)(1)(i))	DAE	<input type="checkbox"/>		NI	N/A
b)	Approx. location(s) of the equipment (e.g., identify unit on facility plot plan)? (265.1064(b)(1)(ii))	DAE	<input type="checkbox"/>		NI	N/A
c)	Type of equipment (eg: pump or pipeline valve)? (265.1064(b)(1)(iii))	DAE	<input type="checkbox"/>		NI	N/A
d)	Percent-by-weight total organics in the hazardous waste stream at the equipment? (265.1064(b)(1)(iv))	DAE	<input type="checkbox"/>		NI	N/A
e)	State of the hazardous waste at the equipment (eg: liquid or gas/vapor)? (265.1064(b)(1)(v))	DAE	<input type="checkbox"/>		NI	N/A
f)	Method of compliance w/ the standard (monthly leak detection/repair or equipped w/ dual mechanical seals?	DAE	<input type="checkbox"/>		NI	N/A
g)	Implementation schedule, if facility can't install a closed-vent system & control device in time? (265.1064(b)(2))	DAE	<input type="checkbox"/>		NI	N/A
h)	A performance test plan if the owner/operator chose to use test data to demonstrate the organic removal efficiency or total organic compound concentration by the control device? (265.1064(b)(3))	DAE	<input type="checkbox"/>		NI	N/A
i)	Include documentation of compliance with the closed-vent and control device standards? (265.1064(b)(4))	DAE	<input type="checkbox"/>		NI	N/A
j)	If a leak is detected?					
i)	A weatherproof & readily visible identification attached to the leaking equipment and marked with: (265.1064(c)(1))					
a)	The equipment i.d. number?	DAE	<input type="checkbox"/>		NI	N/A
b)	Date evidence of a potential leak was found?	DAE	<input type="checkbox"/>		NI	N/A
c)	Date leak was detected?	DAE	<input type="checkbox"/>		NI	N/A

Note: The identification on equipment, except a valve, may be removed after repair. (265.1064(c)(2))

Note: The identification on a valve may be removed after being monitored for two successive months without leaks. (265.1064(c)(3))

ii) In an inspection log the following information? (265.1064(d))						
a)	Instrument, operator and equipment id number? (265.1064(d)(1))	DAE	<input type="checkbox"/>		NI	N/A
b)	Date evidence of a potential leak was found? (265.1064(d)(2))	DAE	<input type="checkbox"/>		NI	N/A
c)	Date leak was detected? (265.1064(d)(3))	DAE	<input type="checkbox"/>		NI	N/A
d)	Date of each attempt to repair the leak? (265.1064(d)(3))	DAE	<input type="checkbox"/>		NI	N/A
e)	Repair methods applied in each attempt to repair the leak? (265.1064(d)(4))	DAE	<input type="checkbox"/>		NI	N/A
f)	"Above 10,000" instrument readings? (265.1064(d)(5))	DAE	<input type="checkbox"/>		NI	N/A
g)	"Repair delayed" and the reason? (265.1064(d)(6))	DAE	<input type="checkbox"/>		NI	N/A
h)	Documentation supporting delay in valve repair? (265.1064(d)(7))	DAE	<input type="checkbox"/>		NI	N/A
i)	Signature of owner/operator whose decision it was not to repair until shutdown? (265.1064(d)(8))	DAE	<input type="checkbox"/>		NI	N/A
j)	If the repair is not done in 15 days the expected date of a successful repair? (265.1064(d)(9))	DAE	<input type="checkbox"/>		NI	N/A
k)	The date of successful repair of the leak? (265.1064(d)(10))	DAE	<input type="checkbox"/>		NI	N/A
iii)	Up-to-date design documentation, monitoring, operating, inspection information for closed-vent & control devices? (265.1064(e))	DAE	<input type="checkbox"/>		NI	N/A
iv)	Control device (other than thermal or catalytic vapor incinerator/flame/boiler/process heater/condenser/carbon adsorption system) have monitoring/inspection information indicating proper operation/maintenance of control device? (265.1064(f))	DAE	<input type="checkbox"/>		NI	N/A
v) The following information regarding the equipment recorded in a log: (265.1064(g))						
a)	List of identification numbers for the equipment subject to the requirements and equipment designated for no detectable emissions? (265.164(g)(1)&(2)(i))	DAE	<input type="checkbox"/>		NI	N/A
b)	The designation of the equipment signed by the owner/operator? (265.1064(g)(2)(ii))	DAE	<input type="checkbox"/>		NI	N/A
c)	List of identification numbers for pressure relief devices? (265.1064(g)(3))	DAE	<input type="checkbox"/>		NI	N/A
d) For each compliance test:						

		YES	NO	NI	N/A
1) Dates of each test? (265.1064(g)(4)(i))	DAE	<input type="checkbox"/>		NI	N/A
2) Background level measured during each test? (265.1064(g)(4)(ii))	DAE	<input type="checkbox"/>		NI	N/A
3) The maximum instrument reading measured at the equipment during each test? (265.1064(g)(4)(iii))	DAE	<input type="checkbox"/>		NI	N/A
e) List of all identification numbers for equipment in vacuum service? (265.1064(g)(5))	DAE	<input type="checkbox"/>		NI	N/A
vi) A log with a list of identification numbers for the valves that are designated unsafe or difficult to monitor, an explanation stating why they are unsafe or difficult and the plan for monitoring? (265.1064(h)(1-2))	DAE	<input type="checkbox"/>		NI	N/A
vii) For valves in gas/vapor or light liquid service with alternative standards the operating record will record: (265.1064(i))					
a) A schedule of monitoring? (265.1064(i)(1))	DAE	<input type="checkbox"/>		NI	N/A
b) The percent of valves found leaking during each monitoring period? (265.1064(i)(2))	DAE	<input type="checkbox"/>		NI	N/A
viii) Is the following information shall be recorded in a log and kept in the operating record: (265.1064(j))					
a) Criteria for failure of seal system indicated by sensor used w/ light liquid service pumps? (265.1064(j)(1))	DAE	<input type="checkbox"/>		NI	N/A
b) Criteria for failure of seal system indicated by sensor used w/ compressors? (265.1064(j)(1))	DAE	<input type="checkbox"/>		NI	N/A
c) Any changes to these criteria and the reason for change? (265.1064(j)(2))	DAE	<input type="checkbox"/>		NI	N/A
ix) The following information kept in a log and used to determine exemptions for the hazardous waste management unit: (265.1064(k))					
a) An analysis determining the design capacity of the management unit? (265.1064(k))	DAE	<input type="checkbox"/>		NI	N/A
b) A statement listing the hazardous waste influent to and effluent from each unit and analysis determining whether the waste is a heavy liquid? (265.1064(k)(2))	DAE	<input type="checkbox"/>		NI	N/A
c) Up-to-date analysis/supporting data used to determine if equipment is subject to standards? (265.1064(k)(3))	DAE	<input type="checkbox"/>		NI	N/A
d) Documentation when knowledge of the hazardous waste stream or process is used? (265.1064(k)(3))	DAE	<input type="checkbox"/>		NI	N/A
e) Any new determinations if the owner/operator takes any action that could result in an increase of the organic content of the waste? (265.1064(k)(3))	DAE	<input type="checkbox"/>		NI	N/A
43. Are records of equipment leak information in 265.1064(d) and closed-vent and control device information in 265.1064(e) kept 3 years? (265.1064(l))	DAE	<input type="checkbox"/>		NI	N/A

Comments: \_\_\_\_\_

PREMIX - 6/10/04 OHP: 004 200 044

# Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	Do any of the following exclusions apply? If yes, please circle.	YES	NO
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**Applicability:** The air emission requirements apply to units subject to subpart I \* unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

\*Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt

CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	NO
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**General Standards:** The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	Waste Determination:	Determination Not Needed	Determination Needed
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Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA-Not Applicable, NI-Not Inspected, OK-In Compliance, DF-Deficiency	NA	NI	OK	DF
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## CONTAINER MANAGEMENT 265.1087

Level 1	OK	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service		Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process

CC-4	265.1087	OK	Controls				
<p>One of the following:</p> <ul style="list-style-type: none"> <li>-Use containers that meet DOT requirements</li> <li>-Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container</li> <li>-Use organic vapor suppression on or above the container</li> </ul> <p>265.1087(c)</p>		<p>One of the following:</p> <ul style="list-style-type: none"> <li>-Use containers that meet DOT requirements</li> <li>-Use containers that operate with no detectable emissions (method 21)</li> <li>-Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27)</li> </ul> <p>265.1087(d)</p>		<ul style="list-style-type: none"> <li>-Containers used to stabilize H.W. with volatile organics greater than 500 ppm</li> <li>-For waste stabilized in a container either: <ul style="list-style-type: none"> <li>1. container must be vented directly to a control device; or</li> <li>2. container is vented inside an enclosure which is exhausted through a closed vent to a control device</li> </ul> </li> <li>-Conservation vents are not allowed</li> </ul> <p>265.1087(b)(2)</p>			



Level 1		Level 2	Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK=In Compliance, DF=Deficiency		NA	NI	OK	DF
CC-5	265.1087	Waste transfer requirements				
No waste transfer requirements apply <div style="text-align: center;">(NA)</div>		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not applicable			
CC-6	265.1087	Operating requirements				
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)		<div style="text-align: center;">(OK)</div>	-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements				
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)		<div style="text-align: center;">(OK)</div>	Inspection requirements are the same as for tanks			
CC-8	265.1087	Repair requirements				
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)		<div style="text-align: center;">(OK)</div>	Necessary corrective measures shall be <u>immediately</u> implemented to ensure that the control device is operated in compliance			
CC-9	265.1090	Recordkeeping requirements				
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service		Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

Comments:

**PREMIX, INC.**

P. O. BOX 281  
44068

NORTH KINGSVILLE, OHIO

August 9, 1989

Ms Marion Tomazos  
Ohio EPA  
2110 Aurora Road  
Twinsburg, Ohio 44087

SUBJECT: Premix, Inc., **OHD 004200044**  
(216) 224-2181

Dear Ms Tomazos:

In accordance with 40 CFR 265.56 (a-g7), Emergency Procedures, this is to further notify you that a reportable incident occurred at the Premix, Inc. Route 20 and Harmon Road facility located in North Kingsville, Ohio.

On July 27, 1989, at approximately 5:00 p.m., a fire occurred in the waste accumulation area. Within minutes, the North Kingsville Fire Department was notified and the facility was evacuated of all personnel. The flames were extinguished by 5:40 p.m. by using dry chemical extinguishers, with a foam blanket to cool the containers. By 6:14 p.m., the situation was completely under control. At 10:45 p.m., the fire department released the scene to Premix, Inc. personnel. No injuries were sustained.

The fire was determined to be caused by spontaneous combustion which initiated exothermic reactions among the S01 storage containers.

The accumulation area contained non-hazardous waste polyester paste; waste polyester resin (D001); waste combustible liquid (F002, F003, F005); and waste paint related materials (D001).

Four samples were pulled from the holding lagoon where the overflow of excess water was collected and submitted to Free-Col Laboratories for analysis the night of the incident. The morning following the incident, the trenches surrounding the accumulation did not contain any residue due to the evaporation of the foam.

On Monday, July 31, 1989, the clean-up operations were initiated. Waste that was not damaged due to the incident was separated and readied for disposal. On Wednesday, August 2, any combustible liquid waste was removed by Chemical Solvents, Inc. (OHD 980897656) for reclamation. Also on Wednesday, Sunrise Waste Transfer removed the non-hazardous polyester paste for disposal. On Thursday, August 3, Sunrise removed the remainder of the non-hazardous paste, and Ross Incineration Services (OHD 048415665) removed all the ignitable liquids for disposal. By Friday, August 4, the accumulation area was free of contamination and back to normal routine procedures.

No hazardous waste occurred outside of the accumulation area other than the smoke/vapor emissions that were generated during the incident.

Analysis of the water samples from the holding lagoon revealed results of less than 0.002 ppm of styrene monomer which is considered to be non-detectable. Styrene was the main component in the waste that was ignited during the incident.

Marion Tomazos  
Page Two  
August 9, 1989

also analyzed were components of the combustible liquid, acetone 7.00 ppm; 1,1,1 trichloroethane 2.5 ppm; MEK 2.10 ppm. All of which were below the TPQ, RQ and OSHA permissible exposure limits. All waste collected during decontamination was disposed of at a licensed RCRA facility.

Due to containment of the waste during the incident, coinciding with test results, it is believed that hazards to human health and the environment were nonexistent.

Sincerely,

PREMIX, INC.

*Debra Parshall-Hall, dl*  
Debra Parshall-Hall, CHMM  
Environmental/Industrial Hygiene Coordinator

dgl

cc: Administrative Director ✓  
US EPA  
Region 5  
230 South Dearborn Street  
Chicago, Illinois 60604

Mr. Allen Bowers  
North Kingsville Fire Department

Mr. Ford Davey  
Mr. Joe Moroski  
Mr. Ken Roxberry  
Premix, Inc.

Investigation Committee File



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road  
Twinsburg, Ohio 44087-1969  
(216) 425-9171



ψ, N, LB, IS, ISS  
CE-44; 228.7, 268.50

Richard F. Celeste  
Governor

December 10, 1987

RE: PREMIX  
ASHTABULA COUNTY  
OHD 004-200-044  
#02-04-0567  
G-TSD

Premix  
Debra Parshall-Hall  
P. O. Box 281  
N. Kingsville, Ohio 44068

Dear Ms. Parshall-Hall:

Thanks for your time and cooperation during my visit to Premix on December 8, 1987. During the inspection a few violations were noted. They are detailed below:

1. No weekly inspections were done in the month of October for the drums storage areas. This is a violation of 40 CFR 265.194 and OAC 3745-66-94. When this was brought to your attention during the inspection, you were made aware that the person assigned to do the inspections was off sick. Please train a back-up inspector or make other arrangements so this does not happen again.
2. Premix has not determined if their F-solvent waste exceeds the treatment standards, in accordance with 40 CFR 268.7(a)(1). Please test the wastes to determine the concentration of the F-solvent wastes.
3. The containers which store the F-solvent waste were not labeled nor was the accumulation on the container. (40 CFR 268.50) Please label these waste containers.

Also, please submit to this office and the Central Office a copy of your closure plan for your storage pad as soon as it is complete. If you have any questions, please give me a call. Thanks for your time.

Sincerely,

Teresa Sabol  
Environmental Engineer  
Division of Solid and Hazardous Waste  
Management

TS/sp

cc: Dave Sholtis, DSHWM, Central Office  
Debby Berg, DSHWM, NEDO

Enclosure

December 8, 1997

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFA # 62 04 6567

U.S. EPA I.D. # OH D009200049

GENERAL INFORMATION

Facility: Premix

Address: Route 20 & Harmon Road

City: N. Kingsville

State: Ohio

Zip Code: 44068

County: Ashtabula

Telephone: \_\_\_\_\_

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Debra Hall</u>	<u>Environmental Coordinator</u>	<u>216 224-2181</u>
2.	_____	_____	_____
3.	_____	_____	_____

INSPECTOR(S)

1.	<u>Teresa Sabol</u>	<u>Environmental Engineer</u>	<u>216 425-9171</u>
2.	_____	_____	_____
3.	_____	_____	_____

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☐ Generator only (G)

☐ Transporter (T)

☐ TSDF only

☐ G-T

☒ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure

☒ Containers S01

☐ Tanks S02/T01

☐ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment

☐ Waste Piles S03

☐ Land Treatment D01

☐ Landfills D00

☐ Chemical/Physical/Biological T04

☐ Groundwater Monitoring

☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

- |   | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|------------|-----------|------------|-----------------|
| 1. Has the facility submitted a Part A to Ohio?                           | <u>✓</u>   | <u>—</u>  | <u>—</u>   | <u>—</u>        |
| 2. If "yes", is it complete and accurate?                                 | <u>✓</u>   | <u>—</u>  | <u>—</u>   | <u>—</u>        |
| 3. Has the facility submitted a Part B?                                   | <u>—</u>   | <u>—</u>  | <u>✓</u>   | <u>—</u>        |
| 4. Was advance notice of the inspection given? If so, how far in advance? | <u>✓</u>   | <u>—</u>  | <u>—</u>   | <u>2 weeks</u>  |

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.



# RCRA INTERIM STATUS INSPECTION FORM

## 40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

	Yes	No	N/A	Remark #
<u>Subpart B: General Facility Standards</u>				
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
b) Physical separation of incompatible waste materials.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>

# RCRA INTERIM STATUS INSPECTION FORM

## 40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<u>—</u>	<u>✓</u>	<u>—</u>	<u>          </u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)) [3745-65-01]	<u>—</u>	<u>✓</u>	<u>—</u>	<u>          </u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<u>✓</u>	<u>—</u>	<u>—</u>	<u>          </u>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The date that accumulation began is clearly marked on each container.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] —   ☒   —   —
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
  - a) Internal alarm system. ☒   —   —   —
  - b) Access to telephone, radio or other device for summoning emergency assistance. ☒   —   —   —
  - c) Portable fire control equipment. ☒   —   —   —
  - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. ☒   —   —   —
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] ☒   —   —   —
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] ☒   —   —   —
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] ☒   —   —   —
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] ☒   —   —   —
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] —   —   ☒   —



# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
  - a) Actions to be taken by personnel in the event of an emergency incident.
  - b) Arrangements or agreements with local or state emergency authorities.
  - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
  - d) A list of all emergency equipment including location, physical description and outline of capabilities.
  - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)]

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart E: Manifests/Records/Reporting

**NOTE:** THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

<u>✓</u>	___	___	___
<u>✓</u>	___	___	___
<u>✓</u>	___	___	___
<u>✓</u>	___	___	___
<u>✓</u>	___	___	___
___	___	<u>✓</u>	___
<u>✓</u>	___	___	___
___	<u>✓</u>	___	<u>missing no inspections in 1980</u>
___	___	<u>✓</u>	___
<u>✓</u>	___	___	___

# RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	✓			

**NOTE:** THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]			✓	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]			✓	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]			✓	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]			✓	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]			✓	

RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- |   |                                     |                          |                                     |                          |
|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| a) A description of how and when the facility will be closed.<br>(265.112(a)(1)) [3745-66-12(A)(1)]   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| d) A description of steps taken to decontaminate facility equipment.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| e) The year closure is expected to begin and a schedule for the various phases of closure.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]                          | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]                          | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]

a) A closure trust fund, or

b) A surety bond, or

c) A closure letter of credit, or

d) A combination of financial mechanisms.

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

3. When was the most recent estimate made?

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

5. When was the most recent estimate made?

—	—	✓	—
✓	—	—	—
—	—	✓	—
—	—	✓	—
✓	—	—	\$13,600
—	—	—	2/87
—	—	✓	—
—	—	✓	—

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

## Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
b) In good physical condition (265.171) [3745-66-71]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<u>    </u>	<u>✓</u>	<u>    </u>	<u>no inspection in 10/87</u>
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>



# PREMIX, INC.

P. O. BOX 281

NORTH KINGSVILLE, OHIO 44068

PHONE (216) 224-2181

June 27, 1986

RECEIVED

JUL 03 1986

SOLID WASTE BRANCH  
U.S. EPA, REGION V

OHD 004 200 044

RECEIVED

JUL 02 1986

SOLID WASTE BRANCH  
U.S. EPA, REGION V

Mr. Ken Chui  
USEPA  
Region V  
230 South Dearborn Street  
Chicago, IL 60604

SUBJECT: RD&D Permit Application

Dear Mr. Chui:

Enclosed is the information required for a trial solidification process for ignitable waste. The information has been gathered to meet the requirements of the Guidance Manual for Research, Development and Demonstration permits, under 40 CFR Section 270.65.

## Facility

Premix, Inc.  
Route 20 and Harmon Road  
North Kingsville, OH 44068  
(216) 224-2181  
Contact Person: Debra Parshall-Hall, CHMM

PURPOSE: to reduce toxicity of hazardous waste and danger to human health and environment.

## EXPLANATION OF PROPOSED ACTIVITY;

Solidification process for ignitable wastes to render characteristic to non-ignitable.

COPY 2

Mr. Chui  
Page two  
June 27, 1986

GENERAL DESCRIPTION OF PROPOSED ACTIVITY:

*temp present (conting)*  
The solidification process occurs by blending ignitable waste streams together in a portable auger mixer and adding calcumated lime and water. This mixture is thoroughly blended; within 30 minutes the water evaporates leaving a solid insert mass.

TYPE AND QUANTITY OF HAZARDOUS WASTE:

1. Waste resin solution *blended*  
Flammable liquid *styrene monomer 40-50%*  
UN 1866/D001 *mixing*
2. Waste paint related materials  
Flammable liquid  
UN 1263/D001 *whorl type SP*
3. Non-hazardous polyester paste which has been approved for sanitary landfill by the OEPA *galon at*

*See closure plan for 1986*  
Estimated quantities would be approximately 10 drums paste, 2 drums resin, 2 drums of paint per month. Initial trial process would be 2 drums paste, 1 drum resin, 1 drum paint (55 gallons). *165 50% 100%*

A ninety-day time limit should be sufficient for trial analysis. *Operating Period*

From previously analyzed samples from lab testing, no characteristic residues were found.

*gaa*  
No emissions are present during treatment. *constant in design*

Waste will be contained in an auger mixing vessel located outside facility building on a concrete pad, no danger to human health or environment is possible.

Mr. Chui  
Page three  
June 27, 1986


PERSONNEL QUALIFICATIONS:

Debra Parshall-Hall has been trained in all aspects of hazardous materials management and is capable of appreciating the health and environmental risks associated with hazardous waste. She also understands the appropriate methods of conducting scientific experimentation, analysis and research in order to minimize risks. She has just recently achieved the Certification of Hazardous Materials Manager. See attached certificates of training.

If I can be of any further assistance, please contact me.

Sincerely,

PREMIX, INC.

  
Debra Parshall-Hall, CHMM  
Environmental Engineer

mk1

Attachments

cc: Ms. Deborah Burg  
Mr. Robert Carrie  
OEPA

**PREMIX, INC.**

P. O. BOX 281  
44058

NORTH KINGSVILLE, OHIO

DEBRA PARSHALL-HALL

ENVIRONMENTAL ENGINEER

PHONE: 216 224-2181  
TWX: 810 427-2929

Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

PREMIX, INC.

A handwritten signature in cursive script, reading "Debra Parshall-Hall".

Debra Parshall-Hall, CHMM

Environmental Engineer

## Plant Emergency Organization and Job Duties

In the event of a fire or a hazardous spill, emergency control of the situation is imperative. To do this, each person at Premix must keep in mind that our objectives are 1) to protect the lives of the employees of Premix, and 2) to protect the property of the plant where we work. To do this we must follow guidelines to job duties to bring the situation under control as listed on the following pages.

People not assigned to specific duties are to evacuate the plant immediately to the nearest exit when the alarm sounds. People are asked to shut down all equipment in that area. If the emergency is in that area, the people are to exit immediately to the nearest exit. DO NOT EXIT THROUGH HAZARDOUS WASTE STORAGE AREA.

EMPLOYEES ARE NOT TO GO TO THEIR LOCKERS TO GET PERSONAL POSSESSIONS NOR ARE THEY TO ENTER THE BUILDING AFTER EXITING UNLESS INSTRUCTED TO DO SO BY A MEMBER OF THE EMERGENCY ORGANIZATION.

AFTER EXITING, ALL PERSONNEL ARE TO PROCEED TO PREMIX COMMUNITY CENTER.

ALL PERSONNEL, OFFICE AND PLANT, ARE TO EXIT THE BUILDING WHEN AN ALARM SOUNDS.

✓ Any spill in lagoon will be covered by:

✓ Environmental Systems, Inc.

### Fire and Rescue

- |      |                            |                            |
|------|----------------------------|----------------------------|
| ✓ 1. | Chief Oxley                | 998-7200                   |
| ✓ 2. | Assistant Chief Roxberry   | 224-2181                   |
| 3.   | Captain Urich              | 224-1411 (Fire Department) |
| 4.   | Captain Savel              | 224-1411                   |
| 5.   | Assistant Chief Shauberger | 224-1411                   |
| 6.   | Captain Bisbee             | 224-1411                   |
| 7.   | Lieutenant Kortyka         | 224-1411                   |

Ohio Trade and Industrial Fire Fighting Manual is used for fire fighting instruction.

The fire department is aware of the type of waste we generate and of the storage areas. They have had a tour through the facility. They are also aware of all the hazardous raw materials and where they are stored. In case of a fire, the fire department will be called by the person who finds the fire, and they will carry the proper foams and equipment for extinguishing the fire.

In the case of a hazardous spill, the waste (if small quantity) will be cleaned by trained personnel. Our waste, other than solvent, will not have time to contaminate any water source and is so viscous that it will not spread far. Ground soil and waste will be shoveled into drums and treated as a hazardous waste for disposal.

## Plant Emergency Organization

August 28, 1984

In the event of an emergency or accident, the local rescue squad (North Kingsville) and hospitals (Brown Memorial, Conneaut and Ashtabula County Medical Center, Ashtabula) will respond immediately to any problems that may occur. They have in their files copies of our evacuation plan, plans of emergency exits and storage of all hazardous chemicals and possible exposure effects of these chemicals. They have been on a tour through the plant and feel that they could handle any problems that may occur. The fire department is aware of the type of waste we generate and of the storage areas. They have had a tour through the facility. They are also aware of all the hazardous raw materials and where they are stored. In case of a fire, the fire department will be called by the person who finds the fire, and they will carry the proper foams and equipment for extinguishing the fire. They do not wish to have a copy of the Contingency Plan due to the fact that Ken Roxberry (Emergency Coordinator) is the assistant Fire Chief for North Kingsville and is on call 24 hours a day.

Upon an accident or emergency happening, the person finding the emergency sets off the in-plant alarm system to which plant personnel respond. In that case, the emergency coordinator or one of the persons licensed in paramedics will call the rescue squad and the hospital to alert them on what problems have occurred. It takes less than five minutes generally to have the rescue squad at the plant. At this time if the emergency was an exposure problem, the Environmental Engineer or emergency coordinator will have any source of information that is available to help the rescue people or the hospital in treating the person or persons exposed.



## HAZARDOUS WASTE ANALYSIS PLAN

(OAC 3745-65-13)

The following wastes are current that we have been disposing of in the past year. Explained is the procedure used for analysis and individual types of waste that are generated.

### WASTE RESIN

**SOLUTION:** Is resin that is either obsolete and cannot be used any longer or resin that is used for flushing lines for the SMC system. The waste is basically pure. The flash point is 80°-100°. Analysis used for the flash point was Tag Closed Cup ASTM Std. #D-93-79. Ph range is 8-12 and the average viscosity is 6,000 to 10,000 cps. The waste is incinerated by Ross Incineration Services, (WPS-19279) EPA ID #D001 and DOT ID #UN1866, Flammable Liquid.

### WASTE PAINT RELATED

**MATERIAL:** Is waste urethane paint that is pre-catalyzed and cannot be used by the end of the shift. The paint that is left to dispose of is approved for incineration at Ross, Inc. (WPS 19278). EPA ID number is D001, DOT ID #UN 1325, Flammable Liquid NOS. Flash point of 80°-85° by Tag Closed Cup ASTM-D-93-79.

### NON-HAZARDOUS

**WASTE PASTE:** Is a polyester paste that is generated from the thermoset reinforced fiberglass industry. The waste was sampled for ignitibility by using 16 CFR 1500.44 solid flammability analysis.

Samples were pulled from our waste containers in a quart quantity as the waste is placed in drums. If it is a liquid, it is analyzed by Pensky-Martin ASTM Std. #D-93-79 or an equivalent method as approved by the administrator.

Normally our waste would be reevaluated once a year by the disposal facilities. At this time, we would check to see if there were any differences. If any new waste were to be disposed of, these would be analyzed in the above manner.

The flammable waste (D001) is stored away from the non-hazardous waste. Each waste is segregated into specific sections on separate pallets with three-foot aisles between rows.

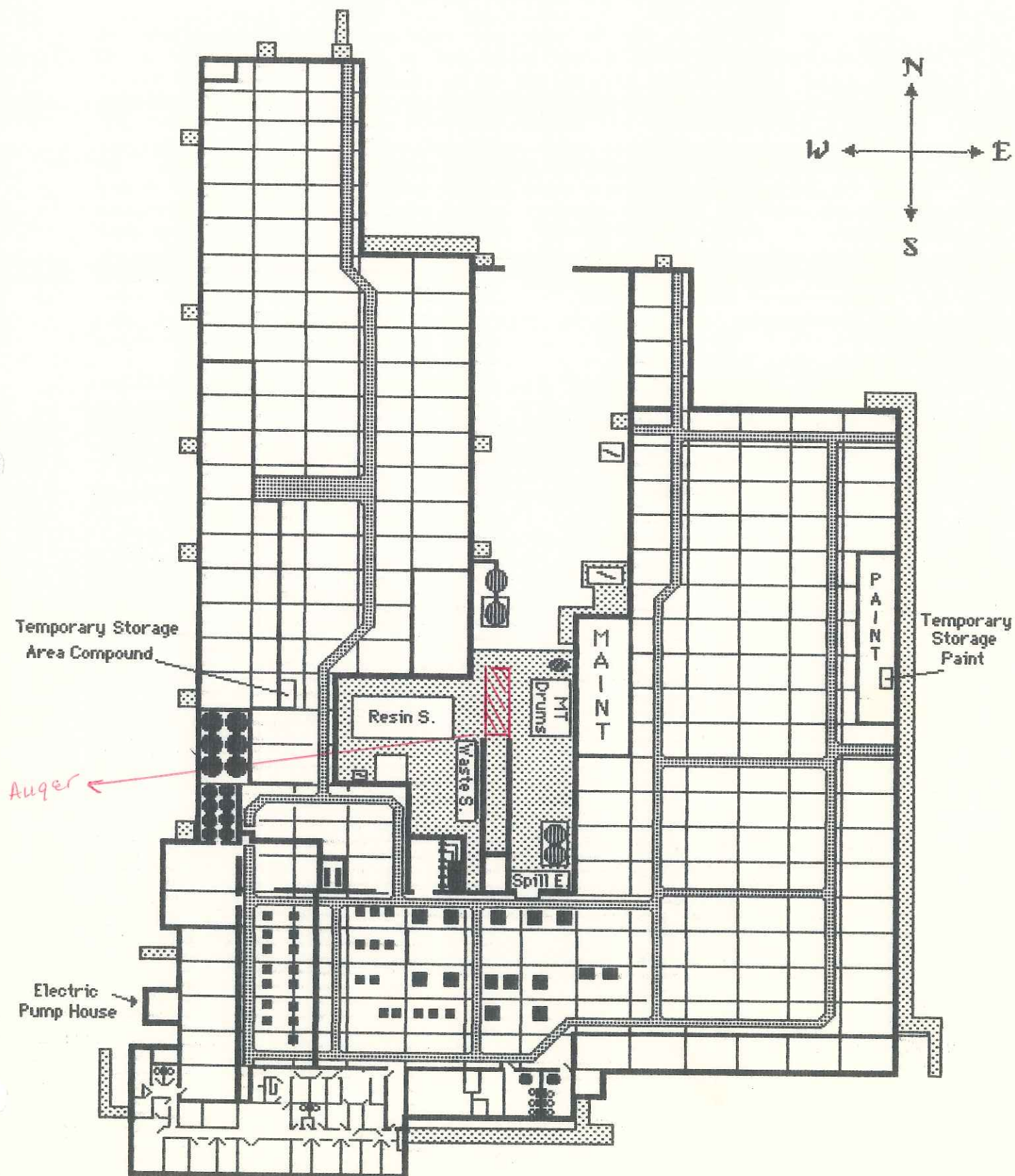
To enable inspections that are done weekly, or for any firefighting that may need to be done, they are stored as designated by the Ohio Fire Code 1301:702, Section F.305.0 Materials Storage.

mkl

Revised May 1986

# *PREMIX, INC.* North Kingsville OH.

## Hazardous Waste Storage Area



## INSPECTION PLAN

(OAC 3745-65-15)

An artificial barrier surrounds the area of our facility. The main drive through the center of the plant has a mesh fence that can be closed and locked when there is no one at the plant. This fence is labeled as to being part of the hazardous waste storage area. Along the wall behind where the flammable wastes are stored is also a sign stating that the wastes are flammable. Down in the center of the plant on a concrete area is a partially diked storage area for solvent waste, paint waste and waste resin. Each area has been designated as to specific waste and also has a sign stating that it is part of the hazardous storage area along with "No Smoking" signs. A weekly inspection sheet is filed for permanent records of the inspections that are done for the storage area. This form is attached. The guards are trained as to what to check for; i.e., leaking drums, drums stacked neatly with aisles between rows. All of this above information is noted.

On days that we are loading waste trucks for waste disposal, a trained person is present to verify that there are not any spills incurred and that all the waste was handled and labeled properly. This is documented on the waste inventory log sheet.

There has never been, nor do we expect, any kind of disturbance of the waste by unauthorized personnel.

Financial Assurance  
OAC 3745-66-43)

Liability 2

A surety bond was posted according to OAC-3745-66-45 in May of 1984 for the amount of \$12,000 which was the amount of the estimated cost of closure at that time.

According to regulations (OAC-3745-66-42), this amount must be adjusted for inflation within 30 days of each anniversary date on which the first closure was prepared.

Upon calling the RCRA hot line for the Consumer Index Deflator, which is derived from the Annual Implicit Price Deflator for GNP and is published by the U.S. Department of Commerce in their Annual Survey of Current Business report, the implicit price deflator for 1985 is 223.45. Subtracting the 1984 price deflator of 215.34 yields an increase of 1.038 for 1985.

Due to the increased cost of disposal over the past year, the closure cost has risen from \$12,000 to \$22,000 for 1985. Using the 1985 estimated closure cost of \$22,000 multiplied by the 1.038 deflator factor equals \$22,836 that the surety bond must be increased to in order to be in compliance with the regulations. The anniversary date of the first closure prepared was August 17, 1984.

In September of 1985, Ross increased incineration prices for 1986. At this time the surety bond for Financial Assurance was increased to \$25,000 to 1986 coverage.

mkl

Revised May 1986

## CLOSURE PLAN

(OAC 3745-66-11 thru 14)

(OAC 3745-66-42)

This facility is an ongoing operation that does not intend to close. It is an operation that is profitable in the FRP industry.

But, if at any time this facility would have to close, the following would be implemented:

1. An inventory would be done on all hazardous waste that is currently in inventory (with the maximum being 210 drums). Due to the facility closing, there would not be any further waste generated other than waste generated from the decontamination process.

Approximate inventory would be:

	<u>#Drums</u>	<u>Type of Waste</u>	<u>Disposal Cost</u>
A.	100	drums of waste resin solution	\$144.00/drum
B.	6	drums of waste paint related materials	152.00/drum
C.	100	drums of waste combustible liquid NOS (contaminated SP-21) <i>cleaning soln</i>	<i>912</i>
D.	3	drums of waste pyridine mixture NOS (QA solvent)	93.00
E.	1	5-gallon pail waste alcohol mixture NOS (R&D solvent) <i>alcohol solvent</i>	66.00

2. Ross Incineration Services, Inc., Grafton, Ohio, would be used for removal and incineration of the following waste:

- A. Waste resin solution
- B. Waste paint related materials
- C. Waste combustible liquid NOS
- D. Waste pyridine mixture NOS
- E. Waste alcohol mixture NOS

Estimated cost for disposal of these wastes is \$15,657, including disposal for 1986. Since the total quantity of the above mentioned waste is 110 drums, this waste will be removed in two different shipments for incineration.

3. The waste combustible liquid NOS will be reclaimed by Chemical Solvents, Inc., Cleveland, Ohio. Cost for disposal of 100 drums would be approximately \$4,000, including transportation, which includes disposal cost for still bottoms of the reclaimed spent solvent. There will not be a credit gain for reclamation of above mentioned waste solvent.

4. Total cost estimate for waste disposal would be \$22,400 for 1986. This would be for the removal of all waste currently on site and should be accomplished within two months' time.
  5. Any decontamination that needed to be done after closure would be completed in the following manner:
    - A. Decontamination of the waste storage area (having a concrete foundation) would be done by washing the foundation with soap and water, absorbing the liquid with an inert clay and placing the waste in drums in preparation for disposal. After this has been completed, a sample will be analyzed for contaminants using EPA methods SW-846 to insure that all contaminants have been removed.
      - (1) The driveway that is located east of the Compound building was previously used for waste resin storage. This area will also be sampled for contaminants, a surface scraping will be done and any contaminated soil will be placed in drums for disposal.

*shall be included in plan, included*

\*A partial closure plan is intended to be submitted for this area prior to 1987. *included?*
      - (2) Estimated labor cost for decontamination of both areas is \$416 (2 men x 16 hours x \$13/hr.).
      - (3) An extra allotted \$300 is included for decontamination disposal.
  6. When all decontamination is complete, an Independent Registered Engineer will be engaged for justification that the facility has been closed in accordance with specifications from OAC 3745-66, 11 thru 14, and OAC 3745-66-42.
    - A. Estimated cost for the registered engineer to prepare closure is \$2,000.
  7. This brings the total estimated cost for closure to \$22,400 for 1986.
- If, at any time, there are process changes, this plan will change accordingly.

mkl

Revised May 1986



# Certificate of Accomplishment

PRESENTED BY



This is to certify that

Debra Parashall-Hall

has participated in and successfully completed

Transporting Dangerous Goods By Air

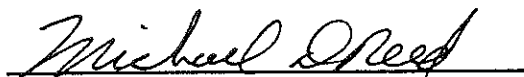
By participating in this program  
the above-named individual has demonstrated a dedication to the  
development and growth of the airfreight industry.

Chaele B. Maddox  
Director of Training & Development

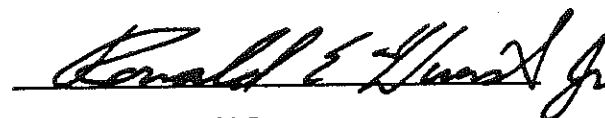
March 13, 1986  
Date

GREATER CLEVELAND POISON CONTROL CENTER'S  
HAZARD COMMUNICATION COORDINATOR SCHOOL  
Certificate of Training

This is to certify that DEBRA HALL of  
PREMIX, INC. has attended and completed a  
sixteen (16) hour training program on hazard communication  
compliance during March 1986 at the Greater Cleveland  
Poison Control Center of University Hospitals of Cleveland,  
Cleveland, Ohio.



Michael D. Reed, Pharm.D.  
Co-Director  
Greater Cleveland Poison Control Center  
University Hospitals of Cleveland  
Cleveland, Ohio



Ronald E. Hurst, M.S.  
Industrial Toxicologist  
Greater Cleveland Poison Control Center  
University Hospitals of Cleveland  
Cleveland, Ohio

# Certificate Of Achievement



This certificate has been awarded to

Debra Hall

at

CLEVELAND, OH.

For successfully completing the Lion Technology Inc.  
Compliance Management Course on the applicable regulations  
of the United States Environmental Protection Agency and the  
United States Department of Transportation regarding the safe  
disposal of wastes designated as hazardous,

as of 19th JULY 1985

A stylized signature in cursive script, appearing to read "W. H. H. H.", written over a horizontal line.  
INSTRUMENTOR

# *Certificate of Completion*

**HazPro '85**



DEBRA S. HALL

---

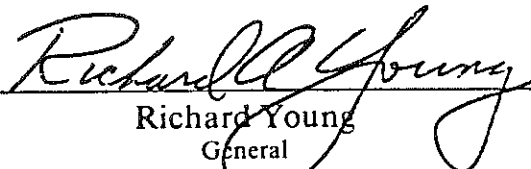
Has completed

Hazardous Materials Management — Advanced Training

This day

May 16, 1985

HAZPRO PROFESSIONAL SYMPOSIUM  
BALTIMORE, MARYLAND

  
Richard Young  
General  
Conference Chairman

  
Instructor

# Certificate of Completion



DEUEL and ASSOCIATES, INC.  
ENVIRONMENTAL CONSULTANTS



**Pollution**  
Engineering

DEBRA HALL

---

Has completed

Hazardous Materials Management - Workshop A

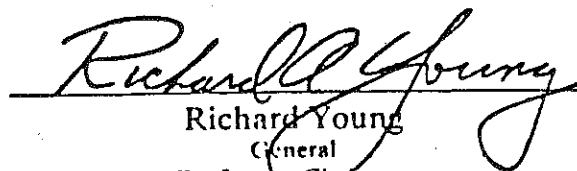
Awarded with Distinction

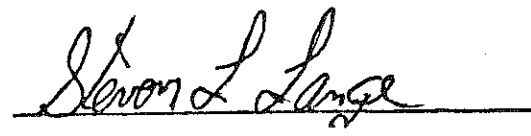
This day

May 15, 1985

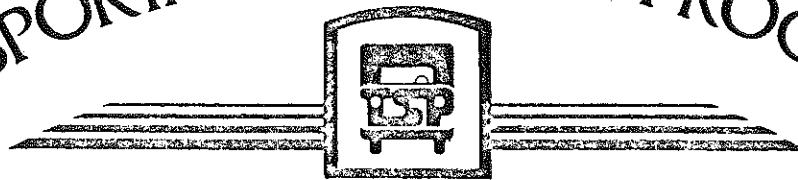
HAZPRO PROFESSIONAL SYMPOSIUM

BALTIMORE, MARYLAND

  
Richard Young  
General  
Conference Chairman

  
Instructor

# TRANSPORTATION SKILLS PROGRAMS



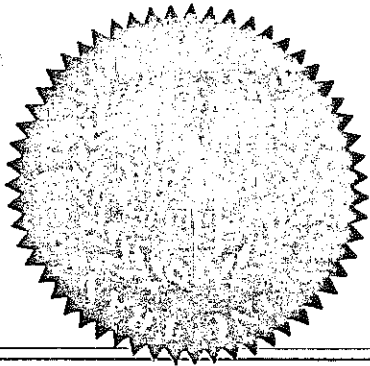
TRANSPORTATION SKILLS PROGRAMS, INC.

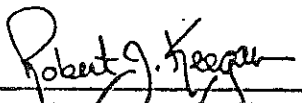
This is to certify that Debra S. Hall

*has successfully completed the*

**TSP Hazardous Materials, Chemicals, and Waste Management and Compliance Seminar**

in a sincere effort to comply with the mandatory and annual training requirements of the U.S. Department of Transportation, the Environmental Protection Agency, and the Occupational Safety and Health Administration.



  
Robert J. Keegan, President

May 7, 1985



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: PremixU.S. EPA I.D. No.: OHD 004-200-044Street: Harmon Rd + Route 20City: N. Kingsville State: Ohio Zip Code: 44068Telephone: 216-224-2181

Operator: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Owner: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Inspection Date: 12/8/87 Time: 8:30 - 11:30 Weather Conditions: Partly Cloudy 40's

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Teresa Sabol</u>	<u>OEPA</u>	<u>216-425-9171</u>

Facility Representatives: Debra Hall 216-224-2181

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	_____	<u>✓</u>	_____
Transporter	_____	_____	_____
Treater	_____	_____	_____
Storer	_____	<u>✓</u>	_____
Disposer	_____	_____	_____

## INSPECTION SUMMARY

**RCRA LAND DISPOSAL RESTRICTION INSPECTION  
APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
<b>A. <u>F-Solvent Wastes</u></b>					
1. F001	_____	_____	_____	_____	_____
2. F002	_____✓_____	_____	_____✓_____	_____	_____
3. F003	_____✓_____	_____	_____✓_____	_____	_____
4. F004	_____	_____	_____	_____	_____
5. F005	_____✓_____	_____	_____✓_____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

**B. California List Wastes *N/A***

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

	Gen.	Treat	Store	Disp.	Trans.
Arsenic 500 mg/L	_____	_____	_____	_____	_____
Cadmium 100 mg/L	_____	_____	_____	_____	_____
Chromium VI 500 mg/L	_____	_____	_____	_____	_____
Lead 500 mg/L	_____	_____	_____	_____	_____
Mercury 20 mg/L	_____	_____	_____	_____	_____
Nickel 134 mg/L	_____	_____	_____	_____	_____
Selenium 100 mg/L	_____	_____	_____	_____	_____
Thallium 130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L *N/A*

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 *N/A*

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to *N/A*

50 ppm _____	_____	_____	_____	_____
--------------	-------	-------	-------	-------

500 ppm _____	_____	_____	_____	_____
---------------	-------	-------	-------	-------

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, state reasons for mixing:

\_\_\_\_\_  
\_\_\_\_\_

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L *N/A*

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes      ☐ No      ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
☐ Pharmaceutical wastewater containing spent methylene chloride  
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? ~~NA~~

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes      ☐ No      ☒ NA

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))? ~~NA~~

☐ Yes      ☐ No      ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**B. Waste Analysis****1. F-Solvent Wastes**

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

How was this determination made?

- Knowledge of waste

\_\_\_\_ Yes    \_\_\_\_ No

If yes, note how this is adequate: \_\_\_\_\_  
\_\_\_\_\_

- TCLP

\_\_\_\_ Yes    \_\_\_\_ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.  
\_\_\_\_\_  
\_\_\_\_\_

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]? *Don't know*

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

If yes, specify the waste stream: \_\_\_\_\_

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

*Yes*  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**2. California List Wastes**

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

\_\_\_\_ Yes    \_\_\_\_ No    ☒ NA



- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      ☒ NA

What type of absorbent is used? \_\_\_\_\_  
Check the types of waste to which absorbent is added.

\_\_\_\_\_ Liquid hazardous waste having a pH less than or equal to 2

\_\_\_\_\_ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

\_\_\_\_\_ Liquid hazardous waste containing metals

\_\_\_\_\_ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

\_\_\_\_\_ Yes      \_\_\_\_\_ No      ☒ NA

If yes, note how this is adequate: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Testing

\_\_\_\_\_ Yes      \_\_\_\_\_ No      ☒ NA

If yes, list test method used: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      ☒ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      ☒ NA

C. Management

## 1. On-Site Management

Is waste that exceeds the treatment standards treated (stored) or disposed on-site?

\_\_\_\_\_ Yes

\_\_\_\_\_ No

~~\_\_\_\_\_~~ Don't know

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

\_\_\_\_\_ Yes

\_\_\_\_\_ No

Don't know

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

\_\_\_\_\_ Yes

\_\_\_\_\_ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes \_\_\_\_\_ No

Applicable treatment standards ☒ Yes \_\_\_\_\_ No

Manifest number ☒ Yes \_\_\_\_\_ No

Waste analysis data, if available ☒ Yes \_\_\_\_\_ No

Identify off-site treatment or storage facilities: Chemical Solvents  
Dennison

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

\_\_\_\_\_ Yes

\_\_\_\_\_ No

Don't know

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

\_\_\_\_\_ Yes

\_\_\_\_\_ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: \_\_\_\_\_

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No ☐ NA

**D. Treatment Using RCRA 264/265 Exempt Units or Processes**  
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☐ No ☐ N/A

If yes, list types of waste treatment units and processes:

\_\_\_\_\_  
\_\_\_\_\_

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA

o California List ☐ Yes ☐ No ☒ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

a. What date was the waste analysis plan last revised? 1986

b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: Free-col, Meadville PA

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

d. Describe the frequency of sampling: \_\_\_\_\_

e. Describe procedures used to identify manifest discrepancies: \_\_\_\_\_

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

**B. Storage (268.50)**

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☒ Tanks  
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☒ No ☐ NA

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4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☐ Yes ☒ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☐ Yes ☒ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☐ No *N/A*

If yes, state how:

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7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

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C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

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3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

4. Describe frequency of testing treatment residuals:

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5. Is dilution used as a substitute for treatment?

\_\_\_\_\_ Yes      \_\_\_\_\_ No



6. Are notifications prepared by the generators kept in the facility's operating record? ☐ Yes ☐ No
7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility? ☐ Yes ☐ No ☐ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets the treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site disposal facilities: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**D. Treatment in Surface Impoundments**

1. Are restricted wastes placed in surface impoundments for treatment? ☐ Yes ☐ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

☐ Yes ☐ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?
- \_\_\_\_\_ Yes      \_\_\_\_\_ No
4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?
- \_\_\_\_\_ Yes      \_\_\_\_\_ No
6. Provide the frequency of analyses conducted on treatment residues: \_\_\_\_\_
- \_\_\_\_\_
7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge      \_\_\_\_\_ Yes      \_\_\_\_\_ No

Supernatant      \_\_\_\_\_ Yes      \_\_\_\_\_ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- c. Are residues subsequently managed in another surface impoundment?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- d. Are residues treated prior to disposal?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, are waste residues treated on-site or off-site?

\_\_\_\_\_ On-site      \_\_\_\_\_ Off-site

Identify treatment method: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

#### E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: \_\_\_\_\_  
 \_\_\_\_\_

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, at what frequency? \_\_\_\_\_  
 \_\_\_\_\_

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

7. What is the volume of the restricted wastes disposed of to date?

\_\_\_\_\_

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

APPENDIX B  
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L)	
	WASTEWATERS	OTHER WASTES
✕ Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
✓ Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
+ Toluene	1.12	0.33
+ 1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
+ Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
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~~Chemical Solvents Foo 2,3,5 (lights)~~

~~Ross Foo2,3,5 (heavies)~~

Chemical Solvents Reclamation Foo2,3,5

Ross Incineration Incineration Foo2,3,5



Re: DHMM  
Ashtabula County  
Permit No. 02-04-0567

Ms. Debbi Hall, Environmental Specialist  
Premix, Inc.  
P.O. Box 281  
North Kingsville, Ohio 44068

December 3, 1982

Dear Ms. Hall:

This letter is in response to our telephone conversation of November 29, 1982. Based upon your comments and the October 1, 1982, document submittal for this facility, the RCRA compliance status of Premix, Inc. is as follows:

<u>Description of Violation</u>	<u>40 CFR</u>	<u>OAC</u>
1. The revised Waste Analysis Plan is still deficient in a delineation of approved sampling techniques, required parameters and analytical procedures.	265.13 (b)	3745-55-13 (B)
2. As the primary emergency coordinator, Ken Roxberry should be included in your training program and all appropriate records for him maintained. Formalize dates of training and describe the types of training received by your nine (9) hazardous waste handlers.	265.16 (a) thru (e)	3745-55-16 (A) thru (E)
3. I understand that the Contingency Plan (September 1982) has now been incorporated into the Plant Safety Manual. Please forward a copy of this manual. This manual must include all items required in the hazardous waste regulations.	265.51 thru 265.56	3745-55-51 thru 3745-55-56
4. As we agreed, the Closure Plan (September 17, 1982) needs revision to reflect appropriate maximum volumes, disposal options and costs, and decontamination procedures.	265.112 265.113	3745-56-03 3745-56-04
5. Please forward example copies of your storage inspection log and waste handling/operating log as requested in my August 18, 1982, letter.	265.174 265.73 (b)(1), (b)(2), (b)(5)	3745-56-54 3745-55-73 (B)(1), (B)(2), (B)(5)



Re: DHMM  
Ashtabula County  
Permit No. 02-04-0567

RECEIVED  
SEP 1 1982  
WASTE MANAGEMENT BRANCH  
EPA REGION V

Ms. Debbi Hall, Environmental Specialist  
Premix, Inc.  
P.O. Box 281  
North Kingsville, Ohio 44068

August 18, 1982

Dear Ms. Hall:

Thank you for the courtesies extended by you during my June 22, 1982, inspection at the Premix, Inc., facility. Mr. Gary Gifford, of this office, accompanied me at that time. The purpose of this inspection was to ascertain compliance with State and Federal hazardous waste management rules. A copy of the inspection report is enclosed for your information. This inspection report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management, and will also be forwarded to Ms. Kathy Homer of U.S. EPA, Region V.

During the inspection, we discussed the analytical procedures you had undertaken relative to the ignitable/nonignitable character of the waste resin paste, and had the opportunity to view a bench demonstration in your laboratory. The Agency is in receipt of your June 30, 1982, letter which delineates the various analytical procedures undertaken and the physical composition of the waste. Considering the present RCRA definition of ignitable solid and the currently available testing procedures, the Ohio EPA recognizes your change in status for the waste resin paste to be a nonhazardous characteristic. As this change in status influences the content of your Part A permit application, you may wish to submit a revised Part A application to U.S. EPA, Region V, and the Ohio Hazardous Waste Facility Approval Board, with appropriate justification comments included. At the State level, this matter will be handled through permit modification procedures.

The inspection report indicates that the following violations exist at the Premix, Inc., storage facility:

<u>Description of Violation</u>	<u>40 CFR</u>	<u>OAC</u>
1. The existing Waste Analysis Plan should be expanded to include sampling techniques, analytical procedures, frequency of analysis, and parameters necessary to assure proper storage of wastes.	265.13 (b)	3745-55-13 (B)
2. The written inspection plan should indicate that the storage area should be inspected each day that handling/loading activities occur.	265.15 (b)(4)	3745-55-15 (B)(4)

Ms. Debbi Hall  
Premix, Inc.  
August 18, 1982  
Page Two

<u>Description of Violation</u>	<u>40 CFR</u>	<u>OAC</u>
3. Personnel training records should be formalized for all personnel associated with waste handling activities. Types of training should be described all dates of training documented.	265.16 (a) thru (e)	3745-55-16 (A) thru (E)
4. The existing plant emergency plan should be expanded to meet the requirements of a Contingency Plan for hazardous waste.	265.51 thru 265.56	3745-55-51 thru 3745-55-56
5. An operating record should be maintained for the waste solvents, in addition to the waste paint.	265.73 (b)(1),(2)	3745-55-73 (B)(1),(2)
6. Inspections of the storage area should be documented;	265.174	3745-56-54
7. and maintained as a part of the operating record.	265.73 (b)(5)	3745-55-73 (B)(5)
8. The existing Closure Plan needs to be amended due to status change of waste resin paste. Decontamination steps should be discussed. Wastes must be removed from the site within 90 days of receipt of the final volume. (Note: A revised closure cost estimate may be appropriate.)	265.112 265.113	3745-56-03 3745-56-04

Please submit documentation for correction of the above noted violations to my attention, at the Northeast District Office of the Ohio EPA, within thirty (30) days of receipt of this letter.

Please feel free to contact me, or Ms. Kathy Homer at (312) 886-7435, if you have further questions.

Sincerely,

Deborah J. Berg, R.S.  
Environmental Scientist  
Division of Hazardous Materials Management

DJB:c11

Enclosure

cc: Ms. Kathy Homer, U.S. EPA, Region V  
Mr. Bob Fragale, Hazardous Waste Facility Approval Board, Central Office  
Ms. Paula Cotter, Div. of Hazardous Materials Management, Central Office

# RCRA Inspection Report

EPA Identification Number OHD 004200044

HWFA8 Permit Number (if appropriate) 02-04-0567

Facility Name Premix, Inc. (mailing: P.O. Box 281)

Location Horton Road & Route 20

North Kingsville, Ohio Ohio 44068

Person(s) Interviewed

Title

Telephone

Debbi Hall

Environmental Specialist

216-224-2181

Inspector(s)

Agency/Title

Telephone

Deborah J. Berg

Ohio EPA Env. Scientist

216-425-9171

Ohio EPA

Ohio EPA

## Installation Activity

Mark One

☐ Generator only (G)

☐ Transporter only (T)

☐ TSDF only

☐ G-T

☒ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☐ Waste Piles S03

☐ Land Treatment D81

☐ Landfills D80

If the site is a TSDF, check the boxes indicating which forms were used -

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting

☐ Groundwater Monitoring

☒ Closure and Post-Closure

☒ Financial Requirements

☒ Containers S01

☐ Tanks S02/T01

☒ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment T03

☐ Chemical/Physical/Biological T04

## RCRA INTERIM STATUS INSPECTION FORM

## PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OH0 004200044

Facility: Premix, Inc. Location: Harmon Road & Route 20  
Address: P.O. Box 281 City: North Kingsville  
State: Ohio Zip Code: 44068 County: Adams Telephone: 216-224-2181  
Facility Operator: Debbie Hall Title: Environmental Specialist Telephone: 216-224-2181  
Facility Owner: Premix, Inc. Address: P.O. Box 281  
City: North Kingsville State: Ohio Zip Code: 44068 Telephone: 216-224-2181  
Type of Ownership: ☒ Private ☐ Government State HWFAB No. 02-04-0567

Date of Inspection: 6-22-82 Time of Inspection: (Start) 1:00 pm (Finish) 4:00 p.m.Advance Notification? ☐ No ☒ Yes: scheduled 6-14-82Weather Conditions: partly sunny temp. low 70's F.

## INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Debbie Hall</u>	<u>Environmental Specialist</u>	<u>216-224-2181</u>
2.	<u>Rory Gifford</u>	<u>Environmental Scientist - OEPA</u>	<u>216-425-9171</u>
3.	<u></u>	<u></u>	<u></u>
4.	<u></u>	<u></u>	<u></u>

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INSPECTOR(S)

(Name)

(Title)

(Telephone)

- |    |                 |                         |              |
|----|-----------------|-------------------------|--------------|
| 1. | Deborah J. Berg | Environmental Scientist | 316-435-9171 |
| 2. |                 |                         |              |
| 3. |                 |                         |              |
| 4. |                 |                         |              |

1. Type(s) of hazardous waste site activity: A. ✓ Generation B. ✓ Storage C.        Treatment  
D.        Transportation E.        Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

- a) Listed Wastes: F002, F003, F005 solvent waste consisting predominantly of  
methylene chloride, acetone & toluene.

- b) Non-Listed Wastes: D001<sup>I</sup> D002<sup>C</sup> D003<sup>R</sup> D000<sup>T</sup>
- D001 - ignitable paint waste

3. Has this facility submitted a Part A Permit Application? ✓ Yes        No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

           Yes, See Remark #                   ✓        No

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5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

\_\_\_\_\_ Yes, See Remark # \_\_\_\_\_ ☒ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

\_\_\_\_\_ Yes, Complete Part 3 (Transp.) ☒ No

a) Applicable U.S. EPA I.D. Number \_\_\_\_\_

b) Ohio P.U.C.O. GR TRSF Number \_\_\_\_\_

7. A brief description of site activity:

*storage in drums (maximum 11,550 gallons ~ 210 drums) of listed solvents & characteristic paint waste.*

REMARKS, PART 1. (GENERAL INFORMATION)

*Company originally considered a waste resin paste to be D001. Subsequent testing of this waste by the company has ~~confirmed~~ demonstrated the waste is not D001 (ignitable solid) by currently available testing procedures (company statement attached).*

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PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>Remark #1</u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<u>    </u>	<u>✓</u>	<u>    </u>	<u>    </u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<u>    </u>	<u>✓</u>	<u>    </u>	<u>    </u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<u>    </u>	<u>    </u>	<u>✓</u>	<u>at CHAS time</u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>



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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<u>✓</u>	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	<u>✓</u>	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	<u>✓</u>	—	—	—
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	<u>✓</u>	—	—	—
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	<u>✓</u>	—	—	—
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	—	—	<u>✓</u>	—
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:	—	—	<u>✓</u>	—
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	—	—	<u>✓</u>	—

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>          </u>
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>          </u>
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>          </u>
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>          </u>
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>          </u>
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>          </u>
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>          </u>
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>see Part 4,</u> <u>Subpart B</u>
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>          </u>

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11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

Yes   No   N/A   Remark #

\_\_\_\_\_   \_\_\_\_\_   ✓   \_\_\_\_\_

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

*Remark #1 Classification of solvent waste as hazardous has been based upon the company's knowledge of the waste & from material data sheets. Paint waste has been found thru testing to be ignitable and not RP toxic. Material data sheets exist for paint components as well as for resin paste waste (Remark, Part 1).*

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## PART 4. GENERAL INTERIM STATUS REQUIREMENTS

### SUBPARTS INCLUDED

B: General Facility Standards  
C: Preparedness and Prevention  
D: Contingency and Emergency

E: Manifest/Records/Reporting  
F: Ground Water Monitoring  
G: Closure

H: Financial Requirements

### Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) 24-hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>7 days a week</u>
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>total plant fenced</u>
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>access controlled</u>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>at storage area</u>

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.15 and 3745-55-15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>copy attached</u>
a) Inspect emergency equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>                    </u>
b) Inspect monitoring equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>                    </u>
c) Inspect security, alarm and communication devices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>                    </u>
d) Inspect process equipment (pipes, pumps, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>                    </u>
e) Inspect containment structures (dikes, curbs, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>                    </u>
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>                    </u>
g) Inspect hazardous waste handling/loading areas each day used.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>                    </u>
h) Record of any malfunctions due to equipment or operator errors.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>at this time</u>
i) Record of any hazardous waste discharges.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>at this time</u>
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Remark #1</u>
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Remark #1</u>
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).				

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
b) Physical separation of incompatible waste materials.	<u>—</u>	<u>—</u>	<u>✓</u>	<u>—</u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<u>—</u>	<u>—</u>	<u>✓</u>	<u>—</u>

## Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<u>—</u>	<u>✓</u>	<u>—</u>	<u>—</u>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
a) Internal alarm system.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>plant alarm system tied to N Kingsville fire dept.</u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>telephone access to coordinators office or to outside assistance</u>
c) Portable fire control equipment.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>extinguishers</u>
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>hydrant &amp; hoses at storage area</u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>

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5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>    </u>	<u>    </u>	<u>✓</u>	<u>    </u>

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:
  - a) Actions to be taken by personnel in the event of an emergency incident.
  - b) Arrangements or agreements with local or state emergency authorities.
  - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
  - d) A list of all emergency equipment including location, physical description and outline of capabilities.
  - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).

<u>    </u>	<u>✓</u>	<u>    </u>	<u>Remark #2</u>
<u>    </u>	<u>✓</u>	<u>    </u>	<u>"</u>
<u>    </u>	<u>✓</u>	<u>    </u>	<u>"</u>
<u>    </u>	<u>✓</u>	<u>    </u>	<u>"</u>
<u>    </u>	<u>✓</u>	<u>    </u>	<u>"</u>
<u>    </u>	<u>✓</u>	<u>    </u>	<u>Remark #3</u>
<u>    </u>	<u>✓</u>	<u>    </u>	<u>Remark #4</u>



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3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.

Yes	No	N/A	Remark #
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	existing plan was revised on occasion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

## Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:
  - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b) (1) and 3745-55-73-B-1).
  - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
  - c) The estimated (or actual) weight, volume or density of the waste material(s).
  - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).

Yes	No	N/A	Remark #
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	required for waste paint & waste solvents
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark#</u>
e) The present physical location of each hazardous waste within the facility.	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>      </u>
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b) (2) and 3745-55-73-B-2).	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>
g) Records of any waste analyses and trial tests required to be performed.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>inspections of storage area not documented</u>
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>
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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>
--	---------------	---------------	--------------	---------------

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	_____	_____	<u>✓</u>	_____
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	_____	_____	<u>✓</u>	_____
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	<u>✓</u>	_____
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	<u>✓</u>	_____

## Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	_____	_____	<u>✓</u>	_____

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	___	___	<u>✓</u>	___
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	___	___	<u>✓</u>	___

## Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u>✓</u>	___	___	<u>Remark #5</u>
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>✓</u>	___	___	___
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	___	___	<u>✓</u>	___
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u>✓</u>	___	___	___
d) A description of steps taken to decontaminate facility equipment.	___	<u>✓</u>	___	___
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	___	<u>✓</u>	___	<u>Remark #5</u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u>✓</u>	___	___	<u>newly revised plan will be developed due to waste basin issue.</u>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	✓	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	✓	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	✓	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	✓	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	✓	—
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> DISPOSAL FACILITIES.				
5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	✓	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	✓	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	✓	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	✓	—

# RCRA INTERIM STATUS INSPECTION FORM

- |  | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|------------|-----------|------------|-----------------|
| 9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10. | —          | —         | ✓          | —               |

## Subpart H: Financial Requirements

- |  |   |   |   |   |
|--|---|---|---|---|
| 1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32). | ✓ | — | — | — |
|--|---|---|---|---|

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

## REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

Remark #1 Training records need to be formalized for all personnel immediately associated with waste handling activities, including inspection duties, operating log functions & contingency plan implementation. Various types of training conducted should be described & dates of training (& annual review) documented.

Remark #2 Facility has on file a plant emergency plan which delineates duties & responsibilities for fire emergencies within the plant. This plan should be expanded to specifically address spill & fire emergencies at the waste storage area.

Remark #3 Existing <sup>plant</sup> evacuation plan is inappropriate in this instance, as plan indicates that a substantial number of plant employees would exist directly into the storage area.

Remark #4 Expanded plan (see above) should be submitted when developed.

Remark #5 Closure plan needs revision due to change in box status of waste basin. Pay particular attention to maximum volumes & time 4-10 restrictions for waste removal after start of closure. Documentation also should be discussed in more detail - particularly since inspections are

# RCRA INTERIM STATUS INSPECTION FORM

## PART 5. TREATMENT/STORAGE/DISPOSAL

### SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

### Subpart I: Management of Containers

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
------------	-----------	------------	-----------------

1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).

✓

2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).

—

✓

*INSPECTIONS NOT  
DOCUMENTED*

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
------------	-----------	------------	-----------------

3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).

✓

4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).

—

—

✓



RCRA INTERIM STATUS INSPECTION FORM

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

Yes   No   N/A   Remark #

✓

# PREMI, INC.

P. O. BOX 281

NORTH KINGSVILLE, OHIO 44058

PHONE (216) 224-2181

June 30, 1982

Ms. Debby Burg  
Ohio EPA  
Northeast Office  
2110 E. Aurora Road  
Twinsburg, OH 44087

Dear Debby:

Regarding our conversation on paste waste, we do not feel that this waste should be classified a flammable solid. We have done numerous tests on this waste for flash points using the Pensky-Martin closed cup tester. We have tried igniting this waste, and samples were also analyzed by two different outside Labs.

The testing we've done consists of using six month old waste paste and letting the sample cans sit open for two weeks before we tried to ignite them, and also using a waste that was recently generated for comparison. Both samples reacted identically. On some of the samples there was an ignition and a small flame that gradually burnt across the sample, but in no way was the sample considered "burning vigorously".

Gilbert Laboratories of Reading, Pennsylvania, analyzed three paste samples for us, using their own ignitability test. The procedure is as follows:

1. Introduction of flame to sample at ambient temperature (24°C).
2. Introduction of flame to sample at 60°C.
3. Gradual heating in an electric muffle furnace to 400°C.

Free-Col Laboratories, Meadville, Pennsylvania, analyzed five of our paste can samples using the test prescribed in 16 CFR, Section 1500.44, which is an amendment to 29 CFR, OSHA standards. In this test a sample is placed in a metal shaped boat and a flame is introduced to the sample at one end (the sample is not sheltered from the air). If the sample ignites and burns with a self-sustained flame at a rate greater than one-tenth of an inch per second along its major axis, it is considered flammable. None of the above samples exhibited the characteristics of a flammable solid when tested.

RECEIVED

JUL 1 - 1982

OHIO ENVIRONMENTAL  
PROTECTION AGENCY  
N. E. D. O.

**Ohio EPA**

RECEIVED  
OCT -1 1981  
WASTE MANAGEMENT BRANCH  
EPA REGION V

RE: Application Number 81-HW-0567  
Ashtabula County

September 28, 1981

Ms. Debbi Hall  
Environmental Specialist  
Premix, Inc.  
P.O. Box 281  
North Kingsville, Ohio 44068

Dear Ms. Hall:

On September 22, 1981, Chris Frazier and Deborah Berg of the Ohio Environmental Protection Agency conducted an inspection of your facility as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,



Paul Flanigan, P.E.  
Hazardous Waste Materials Management

PF/maf

cc: Kathleen Homer, U.S. EPA, Region V  
Chris Frazier and Deborah Bert, NEDO

CERTIFIED MAIL



DEFICIENCY NOTIFICATION TABLE  
ISS INSPECTION

FACILITY NO. - 81-HW-0567

OWNER - PREMIX, INC

FACILITY NAME - PREMIX, INC

FACILITY LOCATION - P.O. BOX 281, N. KINGSVILLE, OHIO 44068

FACILITY CONTACT - DEBBIE HALL, ENVIRONMENTAL SPECIALIST

ISS INSPECTION DATE - 9/22/81

PHONE NO.

(216)  
224-2181

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			:
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13	B	✓	
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15	B	✓	
	2	"	"	B		
	3	"	"	B		
4	4	"	"	B		
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16	B	✓	
	2	"	"	B		
	3	"	"	B		
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
5	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
6	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.	Reference	USEPA Referen	See Code Following	Refer To ISS, Remark	DEP Use
	A 2	3745-55-52	265.52			
	3	"	"			
	4	"	"			
	5	"	"			
7	B 1	3745-55-53	265.53			
	C 1	3745-55-55	265.55			
	2	"	"			
	3	"	"			
	D 1	3745-55-56	265.56			
	VI A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73	B	✓	
	2b	"	"			
	c	"	"			
	d	"	"			
	e	"	"	B	✓	
	f	"	"			
	g	"	"	B		
9	VII A 1	3745-56-03	265.112	B	✓	
	2	"	"			
	3	"	"			
	4	3745-56-32	265.142	B		
	B 1	3745-56-09	265.118			
	VIII I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173			
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265-192			
	2	"	"			
	3	"	"			
	4	3745-56-73	265-193			
	5	3745-56-74	265.194			
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
	4	3745-57-07	265.226			
	5	"	"			
	6	3745-57-10	265.229			
	7	3745-57-11	265.230			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS. Remark	OEPA Use
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
13	M	7	3745-57-37	265.257		
		1	3745-57-52	265.272		
		2	"	"		
		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
14	N	A	1	3745-57-72	265.302	
			2	"	"	
			3	"	"	
			4	"	"	
		B	1	3745-57-79	265.309	
			2	"	"	
		C	1	3745-56-03	265.112	
			2	"	"	
			3	"	"	
			4	3745-56-32	265.192	
		D	1	3745-57-82	265.312	
				3745-55-17	265.17(b)	
		E	1	3745-57-83	265.313	
			2	3745-55-17	265.17(b)	
15		F	1	3745-57-84	265.314	
			2	"	"	
			3	"	"	
			4	"	"	
		G	1	3745-57-85	265.315	
		O&P				
		I	B	1	3745-58-33	265.373
				2	"	"
				3	"	"
				4	"	"
				5	"	"
16		II	A	1a	3745-58-35	265.375
				b	"	"
				c	"	"
				2a	3745-58-35	265.375
				b	"	"
				B	1	"
				2	"	"
				3	"	"
				4	"	"
				5	"	"
17						



Page	Item No.	AC Reference	USEPA Refere	See Code Following	Refer To ISS Remark	OE Us
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
IX I (A)		3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	3745-52-42	262.42			
	(C)	3745-52-42	262.42			
	2. (A)	3745-52-30	262.30			
	(B)	3745-52-31	262.31			
	(C)	3745-52-33	262.33			
21	3 1	3745-52-34	262.34			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23 X	I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the consideration for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 10 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non-compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.



ATE IDENTIFICATION NUMBER

87-HNL 0567

EPA IDENTIFICATION NUMBER

OH D 004200044

TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A.- General Facility Standards

I. General Information:

- ) Facility Name: Premix, Inc.
- ) Street: P.O. Box 281, Harmon Road
- ) City: North Kingsville (D) State: Ohio (E) Zip Code: 44068
- ) Phone: 216-224-2181 (G) County: Ashtabula
- ) Operator: same as above
- ) Street: \_\_\_\_\_
- ) City: \_\_\_\_\_ (K) State: \_\_\_\_\_ (L) Zip Code: \_\_\_\_\_
- ) Phone: \_\_\_\_\_ (N) County: \_\_\_\_\_
- ) Owner: same as above
- ) Street: \_\_\_\_\_
- ) City: \_\_\_\_\_ (R) State: \_\_\_\_\_ (S) Zip Code: \_\_\_\_\_
- ) Phone: \_\_\_\_\_ (U) County: \_\_\_\_\_
- ) Date of Inspection: 9-22-81 (W) Time of Inspection (From) 9:45 (To) 12:45
- ) Weather Conditions: rainy low 60°F's.

(Y) Person(s) Interviewed	Title	Telephone
<u>Debbi Hall</u>	<u>Environmental Specialist</u>	<u>216-224-2181</u>
_____	_____	_____
_____	_____	_____
(Z) Inspection Participants	Agency/Title	Telephone
_____	_____	_____
_____	_____	_____
_____	_____	_____
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>Chris Frazier</u>	<u>Ohio EPA - Env. Sci.</u>	<u>216-425-9171</u>
<u>Deborah Berg</u>	<u>Ohio EPA - Env. Sci.</u>	<u>216-425-9171</u>

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> A. <u>Storage</u> and/or Treatment<br>1. <u>Containers (I)</u><br>2. Tanks (J)<br>3. Surface Impoundments (K)<br>4. Waste Piles (L) | ___ D. Incineration and/or Thermal Treatment (O and P)  |
| ___ B. Land Treatment (M)   | ___ E. Chemical, Physical, and Biological Treatment (Q) |
| ___ C. Landfills (N)  |   |

Note: If facility is also a generator or transporter of hazardous waste complete section IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:  
(Part 265 Subpart B)

	Yes	No	NI*	Remark
<p>1) Has the Regional Administrator been notified regarding:</p> <p align="right"><i>N.A. = not applicable</i></p>				
1. Receipt of hazardous waste from a foreign source?	—	✓	—	<u>N.A.</u>
2. Facility expansion?	—	✓	—	<u>N.A.</u>
<p>2) General Waste Analysis:</p>				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	✓	—	<u>needs to be formalized in writing</u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	✓	—	<u>N.A.</u>
<p>Security - Do security measures include: (if applicable)</p>				
1. 24-Hour surveillance?	✓	—	—	<u>7 days a week</u>
2. Artificial or natural barrier around facility?	✓	—	—	<u>total plant fenced</u>
3. Controlled entry?	✓	—	—	<u>all haulers accessing storage area must check in with receptionist</u>
4. Danger sign(s) at entrance?	✓	—	—	<u>at hazardous waste storage area</u>
<p>Do Owner or Operator Inspections Include:</p>				
1. Records of malfunctions?	—	✓	—	<u>operator has not been keeping inspection records-</u>
2. Records of operator error?	—	✓	—	<u>however, discussions with operator indicate that no spills or discharges have occurred.</u>
3. Records of discharges?	—	✓	—	

## II' GENERAL FACILITY STANDARDS · continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	<u>formalize schedule. do</u> <u>include storage area inspec</u>
5. Safety, emergency equipment?	✓	---	---	<u>extinguishers, water hoses,</u> <u>alarm &amp; sprinkler systems</u>
6. Security devices?	✓	---	---	
7. Operating and structural devices?	---	✓	---	<u>N.A.</u>
8. Inspection log?	---	✓	---	<u>start storage area</u> <u>inspection log - with</u> <u>items to look for &amp;</u> <u>corrective actions column</u>
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	---	✓	---	<u>formalize as to specific</u>
2. Job descriptions?	---	✓	---	<u>duties which relate to</u> <u>hazardous wastes.</u>
3. Description of training?	---	✓	---	<u>formalize amount of training</u> <u>necessary for each job p</u>
4. Records of training?	✓	---	---	
5. Have facility personnel received required training by 5-19-81?	✓	---	---	<u>by training documentation</u> <u>&amp; verbal discussions.</u>
6. Do new personnel receive required training within six months?	✓	---	---	<u>no new personnel</u>
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	---	---	<u>use bronze bung wrench</u>
2. No smoking signs?	✓	---	---	<u>readily visible</u>
3. Separation and protection from ignition sources?	✓	---	---	

\*Not Inspected



IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

) Maintenance and Operation  
of Facility:

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

Yes No NI\* Remarks

— ✓ —

) If required, does the facility  
have the following equipment:

1. Internal communications or  
alarm systems?

✓ — —

alarm system throughout plant,  
rings to N. Kingsville fire department  
alarm box within 200ft. of storage  
area

2. Telephone or 2-way radios  
at the scene of operations?

✓ — —

telephones inside plant, within  
200 feet of storage area

3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

✓ — —

extinguishers & absorbent material  
fire hydrant & hoses immediately  
available, fire department  
5 minute response time.

Indicate the volume of water and/or foam available for fire control:

) Testing and Maintenance of  
Emergency Equipment:

1. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

✓ — —

inspections on regular schedules  
by safety director, maintenance  
staff, & guards.

2. Is emergency equipment  
maintained in operable  
conditions?

✓ — —

appeared operable

) Has owner or operator provided  
immediate access to internal  
alarms? (if needed)

✓ — —

see (B) 1. above

(E) Is there adequate aisle space for unobstructed movement? ✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI\* Remarks

- |   |          |       |       |   |
|---|----------|-------|-------|---|
| 1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) | <u>✓</u> | _____ | _____ |   |
| 2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?   | <u>✓</u> | _____ | _____ | fire department<br>rescue squad<br>Ashtabula Clinic   |
| 3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?   | <u>✓</u> | _____ | _____ |   |
| 4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?   | <u>✓</u> | _____ | _____ | map shows location of all<br>hydrants and sprinklers,<br><del>extinguishers</del><br>location map<br>received 9-23-81 |
| 5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)   | <u>✓</u> | _____ | _____ | map shows evacuation<br>routes  |

\*Not Inspected

## V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

Yes	No	NI*	Remarks
-----	----	-----	---------

- 3) Are copies of the Contingency Plan available at site and local emergency organizations? ☒ ☐ ☐ North Kingsville Fire Department
- 4) Emergency Coordinator
1. Is the facility Emergency Coordinator identified? ☒ ☐ ☐ \_\_\_\_\_
2. Is coordinator familiar with all aspects of site operation and emergency procedures? ☒ ☐ ☐ \_\_\_\_\_
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan? ☒ ☐ ☐ \_\_\_\_\_
- 5) Emergency Procedures
- If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56? N.A.

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

(Part 265 Subpart E)

Yes	No	NI*	Remarks
-----	----	-----	---------

- 1) Use of Manifest System
1. Does the facility follow the procedures listed in §265.71 for processing each manifest? N. A.
2. Are records of past shipments retained for 3 years? N. A.
- 1) Does the owner or operator meet requirements regarding manifest discrepancies? N. A.

## (C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

— ☒ —

*Some records are presently kept*

2. Does the operating record contain the following information:

- \*\*b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

☒ — —

*drums tagged at start of accumulation, records at reclamation area and by manifest*

- c. The location and quantity of each hazardous waste within the facility?

☒ — —

*storage area located on map*

- \*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — —

*N. A.*

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

— ☒ —

*waste analysis present, but inspections not yet formally recorded.*

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

— — —

*N. A. at this time*

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

— ☒ —

*closure costs not yet available*

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities

## VII. CLOSURE AND POST CLOSURE

(Part 265 Subpart G)

Yes	No	NI*	Remarks
-----	----	-----	---------

## Closure and Post Closure

1. Is the facility closure plan available for inspection by May 19, 1981?

company will submit plan

2. Has this plan been submitted to the Regional Administrator

3. Has closure begun?

4. Is closure estimate available by May 19, 1931?

## Post closure care and use of property

Has the owner or operator supplied  
post closure monitoring plan?  
(effective by May 19, 1981)

N. A.

## VIII. FACILITY STANDARDS

(Part 265, Subparts I thru R)

# USE AND MANAGEMENT OF CONTAINERS

ity Name: Premix, Inc.

Date of Inspection: 9-22-81

Yes	No	NI*	Remarks
-----	----	-----	---------

1. Are containers in good condition?

2. Are containers compatible with waste in them?

3. Are containers stored closed?

4. Are containers managed to prevent leaks?

stored upright on pallets

5. Are containers inspected weekly for leaks and defects?

daily

- 6 Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)

ignitable

Yes No NI Remarks

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_  
N.A.

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

\_\_\_\_\_  
N.A.

J  
TANKS N.A.

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

\_\_\_\_\_  
\_\_\_\_\_

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

\_\_\_\_\_  
\_\_\_\_\_

3. Do continuous feed systems have a waste-feed cutoff?

\_\_\_\_\_  
\_\_\_\_\_

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

\_\_\_\_\_  
\_\_\_\_\_

5. Are required daily and weekly inspections done?

\_\_\_\_\_  
\_\_\_\_\_

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

\_\_\_\_\_  
\_\_\_\_\_

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_  
\_\_\_\_\_

Yes No NI\* Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K  
SURFACE IMPOUNDMENTS *N.A.*

ility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

L  
WASTE PILES

N.A.

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	_____	_____	_____	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	_____	_____	_____	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	_____	_____	_____	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	_____	_____	_____	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	_____	_____	_____	_____

\*Not Inspected



M

LAND TREATMENT

N.A.

ility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Is treated hazardous waste capable of biological or chemical degradation?  
\_\_\_\_\_
2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?  
\_\_\_\_\_
3. Is waste analyzed according to 265.273?  
\_\_\_\_\_
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?  
\_\_\_\_\_
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?  
\_\_\_\_\_
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?  
\_\_\_\_\_
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?  
\_\_\_\_\_
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)  
\_\_\_\_\_
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)  
\_\_\_\_\_

N  
LANDFILLS N.A.

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
<b>(A) General Operating Requirements</b>				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	_____
**2. Collection of run-off from active portions of the fill?	---	---	---	_____
**3. Is collected run off treated?	---	---	---	_____
4. Control of wind dispersal of hazardous waste?	---	---	---	_____
(**Effective 11-19-81)				
<b>(B) Surveying and Recordkeeping</b>				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	_____
2. The contents of each cell and the location of each hazardous waste type within each cell?	---	---	---	_____
<b>(C) Closure and Post-Closure</b>				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	_____
2. Has this plan been submitted to the Regional Administrator?	---	---	---	_____
3. Has closure begun?	---	---	---	_____
4. Is closure cost estimate available by 5-19-81?	---	---	---	_____
<b>(D) Special requirements for ignitable or reactive waste</b>				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
	---	---	---	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.				
Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?				
If not, the provisions of 40 CFR 265.17(b) apply.				
Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?				
2. Does the landfill have a chemically and physically resistant liner system?				
3. Does the landfill have a functional leachate collection system?				
4. Are free liquids stabilized prior to or immediately after placement in the landfill?				
Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?				

O and P  
INCINERATION and THERMAL TREATMENT *N.A.*

(A) Facility Name: \_\_\_\_\_

(B) Date of Inspection: \_\_\_\_\_

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): \_\_\_\_\_

3. Components and steady state condition:

\*\*\*\* Was this component at SS prior to adding waste

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

1. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

Yes No NI\* Re ks

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

st other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in marks any which you feel should be tested.)

Remarks

### III. Monitoring and Inspections

Yes No NI\* Remarks

1. combustion/emission control instruments monitored at least every 15 minutes?

2. steady state maintained or corrections attempted?

3. stack plume observed at least hourly for normal color and opacity?

4. if any stack observations made by owner or operator show a plume different than normal?\*\*

5. if yes to D above, were corrections made to return emissions to normal clearance?\*\*

6. is the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

7. are emergency shutdown controls and alarm systems checked daily for proper operation?

Inspected

Specify in Remarks for what period of time this was checked.

# IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)				
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)				

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q

## CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

N.A.

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?				
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)				

	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.21 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#### IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### 1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
Does the operator have copies of the manifest available for review?	✓	_____	_____	_____
Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓	_____	_____	_____

	Yes	No	N	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N.A. at this time</i>

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>transporter furnishes placards</i>



Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation *N/A*

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>manifests &amp; waste analysis</u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N.A.</u>

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?

☐ ☒ ☐

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:
  - a. Notified the Administrator in writing? ☐ ☐ ☐
  - b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? ☐ ☐ ☐
  - c. Met the Manifest requirements? ☐ ☐ ☐
2. Importing Hazardous Waste, has the generator:
 

Met the manifest requirements? ☐ ☐ ☐

X  
TRANSPORTER REQUIREMENTS  
40 CFR Part 263

A.

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING  
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

- |   |       |       |       |       |
|---|-------|-------|-------|-------|
| Does the transporter record on the manifest the date the waste left the U.S.? | _____ | _____ | _____ | _____ |
| Are signed completed manifest(s) on file?                                     | _____ | _____ | _____ | _____ |

V. MISCELLANEOUS

- |  |       |       |       |       |
|--|-------|-------|-------|-------|
| Does transporter transport hazardous waste into the U.S. from abroad?  | _____ | _____ | _____ | _____ |
| Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? | _____ | _____ | _____ | _____ |

OIE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

Not Inspected

## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Premix, Inc. generates and stores three hazardous wastes on-site — still bottoms, paint sludge and resin paste. All three wastes are stored in drums before shipment off-site for disposal.

Company made the following revisions to application:

F002 remains unchanged but includes F003 + F005 (still bottoms)

D003 changed to D001 (waste resin paste)

F017 changed to D001 (paint residue)

Revised application received at District Office on 9/23/81.

Major deficiencies include lack of storage area inspection log, no waste analysis plan, and no closure plan or estimate was available. Also training records need some improvements. Company agreed to correct deficiencies and submit copies of the waste analysis plan & closure plan as verification.

**Ohio EPA** RECEIVED  
OCT -1 1981  
WASTE MANAGEMENT BRANCH  
EPA, REGION V

RE: Application Number 81-HW-0567  
Ashtabula County  
September 28, 1981

Ms. Debbi Hall  
Environmental Specialist  
Premix, Inc.  
P.O. Box 281  
North Kingsville, Ohio 44068

Dear Ms. Hall:

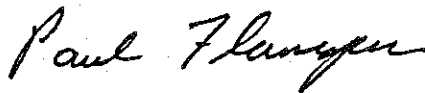
On September 22, 1981, Chris Frazier and Deborah Berg of the Ohio Environmental Protection Agency conducted an inspection of your facility as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,



Paul Flanigan, P.E.  
Hazardous Waste Materials Management

PF/maf

cc: Kathleen Homer, U.S. EPA, Region V  
Chris Frazier and Deborah Bert, NEDO

CERTIFIED MAIL

Premix, Inc.  
P.O. Box 281  
N. Kingsville, Ohio 44068  
July 28, 1981

OH D004200044 OK

USEPA  
Region V  
RCRA Activities  
P.O. Box A 3587  
Chicaeo, Il. 60690

To whom it may concern:

Attached is a letter that was submitted to you when we filed our Form # 3. The photographs that were not forwarded are now enclosed. If there are any questions concerning this, please do not hesitate to phone.

Yours truly,  
Premix, Inc.

*Debbi Parshall Hall*  
Debbi Parshall Hall  
Environmental Specialist

SUB. PART A

<b>PREMIX, INC.</b>		OH D004200044
P. O. BOX 281 44068		NORTH KINGSVILLE, OHIO
DEBBI HALL		
ENVIRONMENTAL SPECIALIST		PHONE 216 224-2181

JUL 29 1981

JUL 30 1981

November 18, 1980

U.S.E.P.A.  
Region V  
RCRA Activities  
P.O. Box 7861  
Chicago, IL 60680

Dear Sirs:

In the EPA Form #3, RCRA Section VI requests photographs of existing storage, treatment and disposal areas. We are in the process of having these prepared, but they are not yet available at the time of the submission of this form.

They will be forwarded as soon as possible.

Yours truly,

PREMIX, INC.

Debbi Parshall  
Environmental Specialist

mkp

JUL 20 1981

# PREMIX, INC.

P. O. BOX 281

NORTH KINGSVILLE, OHIO 44068

PHONE (216) 224-2181

November 18, 1980

U.S.E.P.A.  
Region V  
RCRA Activities  
P.O. Box 7861  
Chicago, IL 60680

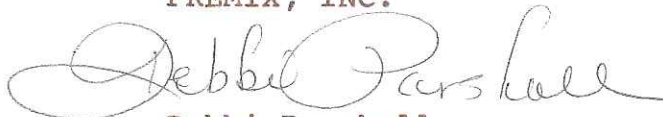
Dear Sirs:

In the EPA Form #1, General Section XI requests a topographic map of the plant and surrounding area. We are in the process of having this prepared, but it is not available at the time of the submission of this form.

The map will be forwarded as soon as it is complete.

Yours truly,

PREMIX, INC.



Debbi Parshall  
Environmental Specialist

mkp



D. Corrective  
Action

Determination: NFA

## PA/VSI Or RFA FILE REVIEW CHECKLIST

Facility Name: Premix, Inc. \_\_\_\_\_

EPA ID: OHD 004 200 044 \_\_\_\_\_ City: North Kingsville \_\_\_\_\_ State: OH \_\_\_\_\_

Name of Reviewer: Maureen McHugh \_\_\_\_\_ Date of Review: 7/22/08 \_\_\_\_\_

1	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Is this a one folder site?
2	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Are there Superfund files for this site?
3	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you Read the Executive Summary?
			There are: <u>8</u> SWMUs and <u>1</u> AOCs at this site.
4	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you review the regulatory history?
5	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Does the facility have interim status or a permit?
			This facility is a: <u>      </u> SQG, <u>  X  </u> LQG, or <u>  X  </u> Less than 90 day.
6	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Was the Facility closed per RCRA? RCRAInfo 380 (1988, 1989)
			If Yes, was the closure: <u>  X  </u> CC, or <u>      </u> CIP.
7	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Are there documented (historical) releases? Briefly describe on Page 2.
8	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSI or RFA file, please classify this site as:

  X   No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

       Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

       More Information Needed: There is no RFA, PA/VSI or RCRA closure information available.

## PA/VSI Or RFA FILE REVIEW CHECKLIST

Notes

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

Fire in 1989 in the outdoor covered drum storage area (SWMU3), an area that contained nonhazardous waste, excess liquid from fighting the fire drained into the on-site pond (AOC1) but samples indicated it had not been contaminated. No releases aside from smoke and vapor generated during the fire.

Odor complaints in 1984 and 1987

Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

PA/VSI Recommendations

Nothing that warrants RRB attention. NFA.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

RECEIVED DEC 22 1992  
WMD RCRA  
RECORD CENTER *Compliance*

REPLY TO THE ATTENTION OF:

HRE-8J

December 15, 1992

Mr. Raymond Kovacs  
Premix, Inc.  
P.O. Box 281  
North Kingsville, Ohio 44068

Re: Visual Site Inspection  
Premix, Inc.  
North Kingsville, Ohio  
OHD 004 200 044

Dear Mr. Kovacs:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief  
Minnesota/Ohio Technical Enforcement Section  
RCRA Enforcement Branch

PRC Environmental Management, Inc.  
233 North Michigan Avenue  
Suite 1621  
Chicago, IL 60601  
312-856-8700  
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**PREMIX, INC.  
NORTH KINGSVILLE, OHIO  
OHD 004 200 044**

**FINAL REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 004 200 044
Date Prepared	:	November 6, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH5V
Prepared by	:	PRC Environmental Management, Inc. (Jean Michaels)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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### Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

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CONFIDENTIAL

## EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Premix, Inc. (Premix), facility in North Kingsville, Ashtabula County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

Premix employs 535 people in the manufacture of reinforced thermoset molding compounds and custom molded fiberglass parts. Premix sells approximately half the molding compounds it manufactures. The remaining compounds are used on site to manufacture the custom molded fiberglass parts. In 1964, Premix began operations at the 61-acre facility, which is located in a rural area near North Kingsville, Ohio. In November 1980, Premix submitted a Part A permit application to operate as a hazardous waste treatment, storage, or disposal facility, storing D001, D003, F002, F003, and F005 wastes in containers (S01). In July 1989, Premix submitted a certification of closure for its former hazardous waste storage areas and indicated that the facility would be operating as a generator of hazardous waste.

Premix currently generates the following hazardous wastes: waste flammable resin (D001); waste organic peroxide (D003); waste solvent ES-2173C (D001); waste pyridine (D001 and F003); waste mixed solvents (D001, F002, F003, and F005); waste solvent ES-265E (D001); waste solvent SP-731 (D001); waste paint and thinner (D001 and D035); and waste stoddard solvent (D001). Premix also generates several nonhazardous wastes: waste glass dust, scrap molding compounds, scrap molded parts, and waste hydraulic oil. Premix currently operates as a large-quantity generator of hazardous waste, storing waste for less than 90 days.

The PA/VSI identified the following eight SWMUs and one AOC at the facility:

### Solid Waste Management Units

1. Former Hazardous Waste Storage Area
2. Former Hazardous Waste Storage Pad
3. Outdoor, Covered Drum Storage Area
4. Waste Solvent Accumulation Area
5. Waste Organic Peroxide Storage Area
6. Waste Paint Accumulation Area
7. Dust Collectors
8. Waste Hydraulic Oil and Stoddard Solvent Storage Area

RELEASED  
DATE 8/5/01  
RIN #         
INITIALS



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Area of Concern

1. On-site Pond

The potential for a release of hazardous constituents from SWMUs to ground water, surface water, air, and on-site soils is low. All active SWMUs have concrete floors and are either bermed or located within the facility building. Several solvent drums, stored within the building, were found stored open during the VSI. Some solvents may volatilize from these open drums; however, because the bung openings are small, the quantity would be minimal.

Premix maintains a 5-acre On-site Pond (AOC 1) into which it discharges treated sanitary waste, noncontact cooling water, and storm run-off. The pond is unlined and may seep into local ground water. Floor drains exist within the facility building only in areas where molding compounds have already been mixed, and therefore, are nonhazardous. The purpose of the floor drains is to drain sprinkler water, in the event of a fire, to the pond. The potential for a hazardous release to a floor drain within the facility building with subsequent discharge to the pond is low.

Receptors which might be affected by potential releases from Premix are limited to wildlife in the On-site Pond because ground water is not used as a source of drinking water in the vicinity of the facility. The closest school is located about 1 mile southwest of the facility. Wetlands exist within 0.5 mile to the south and southeast of the facility. No state or national parks or wildlife preserves exist within 2 miles of the facility.

PRC recommends that a means of containing floor drain discharge, before it enters the pond, be installed. PRC also recommends that all waste drums be stored closed.

RELEASED  
DATE 8/15/01  
RIN #           
INITIALS uv

## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Premix, Inc. (Premix), facility (EPA Identification No. OHD 004 200 044) in North Kingsville, Ashtabula County, Ohio. The PA was completed on June 19, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA), Ohio Department of Natural Resources (ODNR), U.S. Geological Survey (USGS), and from EPA Region 5 RCRA files. The VSI was conducted on June 25, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified eight SWMUs and one AOC at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and eight inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

## **2.0 FACILITY DESCRIPTION**

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

### **2.1 FACILITY LOCATION**

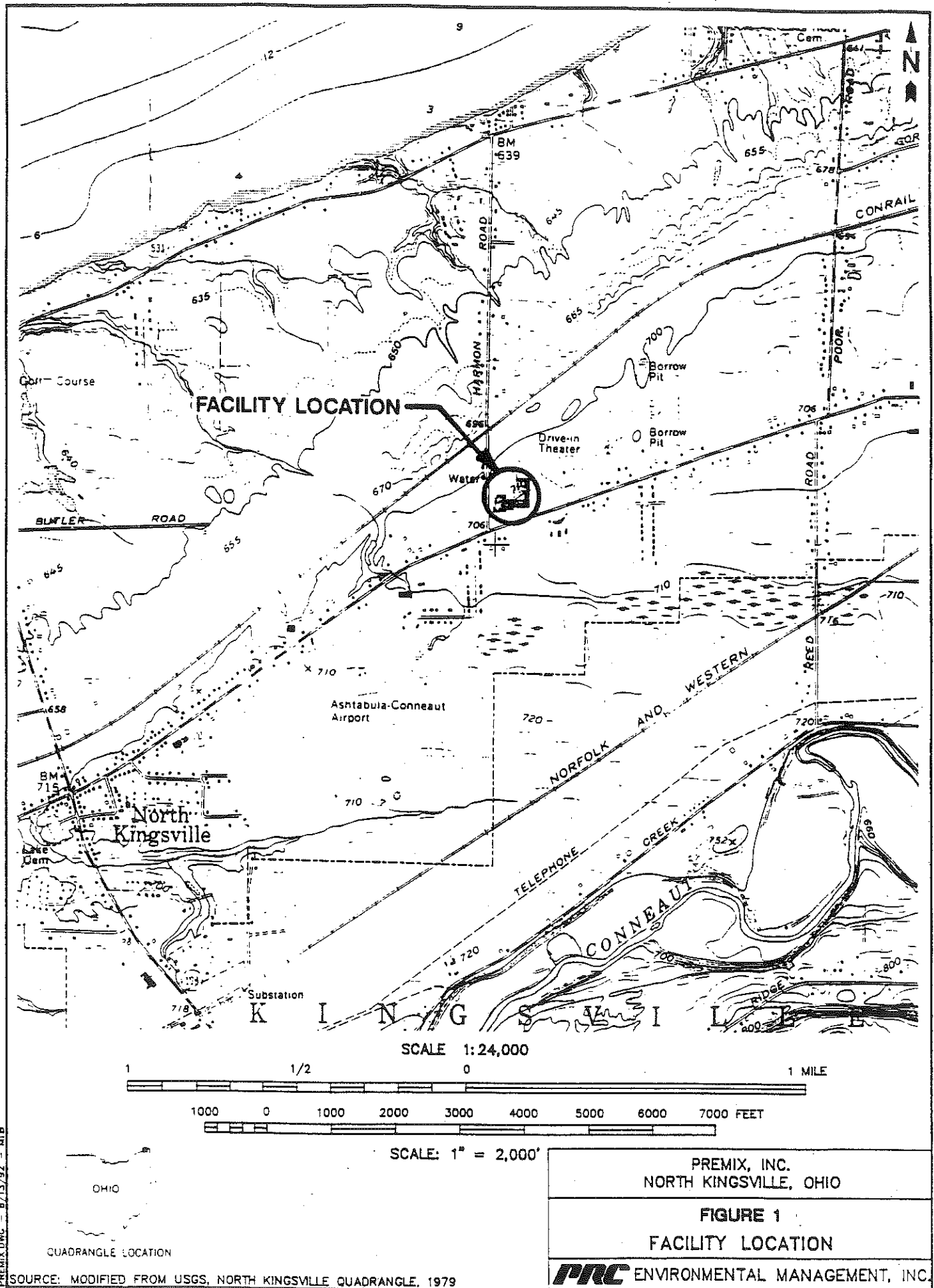
The Premix facility is located at the intersection of Harmon Road and Route 20 in North Kingsville, Ashtabula County, Ohio (latitude 41°55'20"N and longitude 80°39'30"W). The 61-acre facility is located in a rural area and is bordered on the north by railroad tracks and on all other sides by sparsely populated land. Figure 1 shows the facility location in relation to surrounding topographic features. The drive-in theater, shown east of the facility, is no longer present.

### **2.2 FACILITY OPERATIONS**

Premix manufactures reinforced thermoset molding compounds and custom molded fiberglass parts. Approximately half of the molding compounds manufactured at Premix are for sale, while the other half are used by Premix to manufacture custom molded fiberglass parts. Premix has operated at the North Kingsville facility since 1964, and employs approximately 535 people. The facility consists of one building, which has undergone several additions over the years, and a drainage pond. The building currently occupies 280,000 square feet and the pond covers approximately 5 acres.

Premix receives raw materials, including polyester resins, fillers, pigments, and catalysts in drums, bags, and bulk. These raw materials are mixed in 1,000-pound mixing vessels. Finished molding compounds are either rolled into sheets, approximately 0.5 inch thick, or weighed into specific bulk weights. Once molding compounds have been formed into sheets or bulk units, they are either packaged for sale or sent to Premix's press area for molding.

In the press area, molding compounds are injection, compression, or transfer molded into custom parts. After molding, most molded parts are packaged and shipped to customers. However, some molded parts require finishing. Finishing operations include grinding, build-up, solvent bonding, machining, and painting. After finishing operations, finished parts are packaged and shipped to customers.



Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3

### 2.3 WASTE GENERATION AND MANAGEMENT

Premix generates nine hazardous wastes and four nonhazardous wastes at various locations within the facility. SWMUs and their current status are identified in Table 1. The locations of the SWMUs and the AOC in relation to the facility layout are shown in Figure 2. Wastes generated at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

Premix receives polyester resins, fillers, pigments, and catalysts as raw materials for producing molding compounds. These raw materials are mixed in 1,000-pound mixing vessels. The mixing process generates waste flammable resin (D001) and waste organic peroxide (D003). Approximately 6 to 15 drums of waste flammable resin are generated per week and stored in the Outdoor, Covered Drum Storage Area (DSA) (SWMU 3), before being transported to Chemical Solvent, Inc. (CSI), of Cleveland, Ohio for disposal. One drum of waste organic peroxide is generated every 2 months and is stored in the Waste Organic Peroxide Storage Area (SWMU 5). Waste organic peroxide is disposed of at Ross Incineration of Grafton, Ohio.

Premix operates several quality control laboratories that monitor different components of the molding compounds. Measuring the glass content of the molding compounds generates approximately one drum of waste solvent ES-2173C (D001) per week. Measuring the water content of the molding compounds generates one drum of waste pyridine (D001 and F003) per month. Waste solvent ES-2173C is accumulated in the Waste Solvent Accumulation Area (SWMU 4), stored in the Outdoor, Covered DSA (SWMU 3), and disposed of at CSI. Waste pyridine is accumulated in small quantities in the laboratory and transferred directly to SWMU 3 before being transported to Ross Incineration.

Premix uses several solvents and solvent blends for equipment cleaning and solvent bonding molded parts. Over the years Premix has varied the solvents used, using safer, less toxic solvents when appropriate. Waste mixed solvents (D001, F002, F003, and F005), currently consisting of trichloroethane, methanol, toluene, acetone, and Freon-113, are used throughout the facility to clean various equipment. Waste mixed solvents are generated at a rate of 1 to 1.5 drums per week, and accumulated in the Waste Solvent Accumulation Area (SWMU 4) before being transferred to the Outdoor, Covered DSA (SWMU 3). Waste solvent ES-265E (D001), generated at a rate of two to four drums per week, is used to clean equipment during quick change-out operations. Waste solvent SP-731 (D001), generated at a rate of one drum every

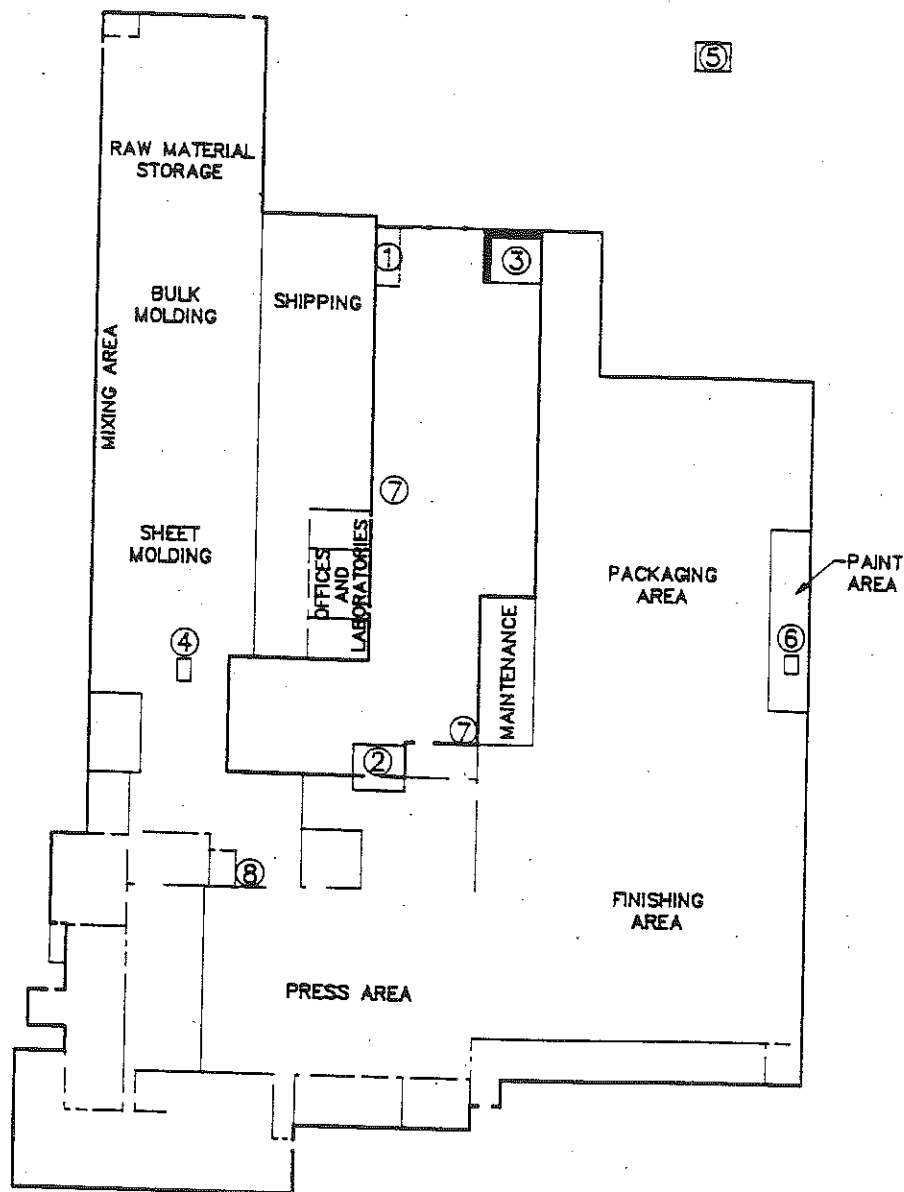
**TABLE 1**  
**SOLID WASTE MANAGEMENT UNITS**

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit<sup>a</sup></u>	<u>Status</u>
1	Former Hazardous Waste Storage Area	Yes	Inactive, ceased operation in 1982, RCRA closure approved in 1989
2	Former Hazardous Waste Storage Pad	Yes	Inactive, ceased operation in 1989, RCRA closure approved in 1989
3	Outdoor, Covered Drum Storage Area	No	Active, less than 90-day storage of hazardous waste
4	Waste Solvent Accumulation Area	No	Active
5	Waste Organic Peroxide Storage Area	No	Active
6	Waste Paint Accumulation Area	No	Active
7	Dust Collectors	No	Active
8	Waste Hydraulic Oil and Stoddard Solvent Storage Area	No	Active

Note:

<sup>a</sup> A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.





### LEGEND

- ① FORMER HAZARDOUS WASTE STORAGE AREA
- ② FORMER HAZARDOUS WASTE STORAGE PAD
- ③ OUTDOOR, COVERED DRUM STORAGE AREA
- ④ WASTE SOLVENT ACCUMULATION AREA
- ⑤ WASTE ORGANIC PEROXIDE STORAGE AREA
- ⑥ WASTE PAINT ACCUMULATION AREA
- ⑦ DUST COLLECTORS
- ⑧ WASTE HYDRAULIC OIL AND STODDARD SOLVENT STORAGE AREA

PREMIX, INC.  
NORTH KINGSVILLE, OHIO

**FIGURE 2**  
**FACILITY LAYOUT**

**PRC** ENVIRONMENTAL MANAGEMENT, INC.

JWG - 8/13/92 - MJB

SOURCE: MODIFIED FROM PREMIX, INC.,  
SKETCH RECEIVED BY PRC ON JUNE 25, 1992

NOT TO SCALE

**TABLE 2**  
**SOLID WASTES**

<u>Waste/EPA Waste Code<sup>a</sup></u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Waste Flammable Resin/D001	Molding compound production	3, and formerly 1 and 2
Waste Organic Peroxide/D003	Molding compound production	5
Waste Solvent ES-2173C/D001	Quality control laboratory	3, 4, and formerly 1 and 2
Waste Pyridine/D001 and F003	Quality control laboratory	3, and formerly 1 and 2
Waste Mixed Solvents/D001, F002, F003, and F005	Equipment cleaning	3, 4, and formerly 1 and 2
Waste Solvent ES-265E/D001	Equipment cleaning	3, and formerly 1 and 2
Waste Solvent SP-731/D001	Solvent bonding	3, and formerly 1 and 2
Waste Paint and Thinner/D001 and D035	Painting operations	3, 6, and formerly 1 and 2
Waste Stoddard Solvent/D001	Maintenance	3, 8, and formerly 1 and 2
Waste Glass Dust/(NA)	Sanding and grinding operations	7
Scrap Molding Compounds/(NA)	Off-specification and excess material	General facility refuse
Scrap Molded Parts/(NA)	Defective and damaged products	General facility refuse
Waste Hydraulic Oil/(NA)	Molding press heating	8

**Notes:**

<sup>a</sup> Not applicable (NA) designates nonhazardous waste.

6 months, is used to solvent-bond molded parts. These wastes are transferred directly to the Outdoor, Covered DSA (SWMU 3). All of these wastes are disposed of at CSI.

Some molded parts require painting. Painting operations generate waste paint and thinner (D001 and D035) at a rate of about one drum every 2 to 4 weeks. Waste paint and thinner is accumulated in the Waste Paint Accumulation Area (SWMU 6), stored in the Outdoor, Covered DSA (SWMU 3), and disposed of at CSI. From 1975 to 1987 Premix operated a water wash paint spray booth. Nonhazardous water from the booth discharged to the On-site Pond (AOC 1). Currently, Premix operates a dry paint spray booth. In 1991, Premix had the paint spray booth filters analyzed for full scan toxicity characteristic leaching procedure (TCLP) analysis. The filters were determined to be nonhazardous and are disposed of in Lake County Landfill in Chesterland, Ohio.

General facility maintenance operations generate waste stoddard solvent (D001) at a rate of one drum per month. This waste is accumulated at the Waste Hydraulic Oil and Stoddard Solvent Storage Area (SWMU 8) before being transferred to the Outdoor, Covered DSA (SWMU 3), and ultimately disposed of at CSI.

Nonhazardous waste glass dust, generated during sanding and grinding of molded parts, is collected in three bag house-type Dust Collectors (SWMU 7). Approximately 200 pounds of glass dust are generated per month. Premix collects the waste glass in drums. A waste hauler transfers the dust from the drums to a roll-off box for disposal at a landfill.

Premix generates nonhazardous scrap molding compounds and molded parts. Scrap molding compounds are generated from off-specification compounds and excess molding compounds returned by customers. Defective and damaged molded parts constitute scrap molded parts. Both of these nonhazardous waste streams are disposed of in the facility's general refuse.

Premix uses hydraulic oil to heat the molding presses. Waste hydraulic oil is accumulated in the Waste Hydraulic Oil and Stoddard Solvent Storage Area (SWMU 8) and sent off site for recycling. Quantities generated were not available.

All wastes that are currently stored in the Outdoor, Covered DSA (SWMU 3), were previously stored in the Former Hazardous Waste Storage Area (SWMU 1) from 1980 until 1982, and at the Former Hazardous Waste Storage Pad (SWMU 2) from 1982 until 1989.

## 2.4

### HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

No documented releases to ground water, surface water, or on-site soils have occurred at the facility. However, in July 1989, a fire occurred in the Outdoor, Covered DSA (SWMU 3). The cause of the fire was determined to be spontaneous combustion which initiated exothermic reactions among the storage containers. The North Kingsville Fire Department extinguished the flames using dry chemical extinguishers with water propellant. At the time of the fire, SWMU 3 contained nonhazardous waste polyester paste, waste polyester resin (D001), waste combustible liquid (F002, F003, and F005), and waste paint related material (D001). Excess liquid from fighting the fire drained, via one of the facility's two drains, to the On-site Pond (AOC 1). Analysis of water samples collected from the On-site Pond indicated that the pond had not been contaminated. The facility maintains that no hazardous waste migrated outside of the storage area other than the smoke and vapor emissions that were generated during the fire (Premix, 1989b).

OEPA received odor complaints from citizens in 1984 and 1987. After investigation in 1984, OEPA found that the complaint was unsubstantiated (OEPA, 1984b). In 1987, OEPA informed a citizen that an independent firm would conduct emission testing in September 1987. Based on the testing data, OEPA would perform computer dispersion modeling to estimate the ground level concentrations of contaminants (OEPA, 1987c). PRC found no follow-up documents indicating whether the testing and modeling was completed.

## 2.5

### REGULATORY HISTORY

Premix submitted a Notification of Hazardous Waste Activity form on August 13, 1980. The form indicated that Premix would be a generator, transporter, and treatment, storage, or disposal (TSD) facility for D001, D00X, F002, F005, and F017 wastes (Premix, 1980a). On November 18, 1980, Premix submitted a RCRA Part A permit application. The application indicated that, as a TSD facility, Premix would handle 26,000 gallons of F002, F003, and F005 waste; 133,200 gallons of D001 and D003 waste; and 20,000 gallons of D001 waste in containers (S01) (Premix, 1980b).

In February 1987, Premix submitted a Request for Partial Closure of its Hazardous Waste Storage Area (SWMU 1) (Premix, 1987a). In October 1987, OEPA approved the partial closure plan, but added several modifications (OEPA, 1987d). EPA concurred with OEPA in a letter to

Premix, dated December 2, 1987 (EPA, 1987). Premix submitted a Request for Closure of Hazardous Waste Storage Unit [SWMU 2], in December 1987 (Premix, 1987b). OEPA approved the closure plan with modifications (OEPA, 1988) and EPA concurred (EPA, 1988). In June 1988, Premix submitted certification of closure for SWMU 1 (Premix, 1988). In July 1989, Premix submitted certification of closure for SWMU 2 (Premix, 1989a). In a 1991 letter from OEPA to EPA, OEPA states that Premix underwent full closure and received a Final Letter on August 8, 1989 (OEPA, 1991). PRC found no record of the August 8, 1989 letter during the PA. In April 1992, OEPA confirmed that Premix submitted a closure plan, OEPA approved the plan, Premix certified closure, and OEPA conducted a closure certification inspection. Based on its inspection and records review, OEPA determined that the storage areas (SWMUs 1 and 2) had been closed in accordance with the approved closure plans, and Premix was now to be regulated as a generator of hazardous waste (OEPA, 1992).

Over the years of operation, Premix has been inspected by OEPA several times. Most inspections resulted in letters of deficiency being sent to Premix for violations related to lack of inspection logs, no waste analysis plan, no closure plan, and inadequate personnel training records (OEPA, 1981a; 1982; 1984c; 1986; 1987a; and 1987e). In July 1987, OEPA filed a Final Findings and Orders against Premix for not having financial and liability coverage (OEPA, 1987b).

In June 1983, OEPA required that Premix apply for a Permit to Install under state law with appendices for several operations, including drying ovens, parts washers, dust collectors, parts grinders, and paint spray booths (OEPA, 1983). Premix submitted the application and OEPA issued Premix's air permit in February 1984 (OEPA, 1984a).

According to a 1981 OEPA "Non-major Industrial Wastewater Inspection Report," Premix discharges all wastewaters, including floor drains, paint booth holding tank overflow, and parts washers, to an on-site pond. Discharge from the facility flows through two underground drains to the on-site pond. The pond does not overflow into "waters of the State" and, therefore, does not require a National Pollutant Discharge Permit (OEPA, 1981b). Premix operates a wastewater treatment system to treat sanitary wastes. Once treated, water discharges to the on-site pond. Storm water run-off from the facility also drains to the pond.

## 2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

### **2.6.1 Climate**

The climate in Ashtabula County is continental. The average daily temperature is 49.2 degrees Fahrenheit (°F). The lowest average daily temperature is 25.6°F in January. The highest average daily temperature is 71.3°F in July (NOAA, 1982). In summer, northern areas nearest Lake Erie are markedly cooler than the rest of the county. The total average annual precipitation for the county is 38 inches. The mean annual lake evaporation is about 31 inches (ODNR, 1991). The 1-year, 24-hour maximum rainfall is 4.0 inches. The prevailing wind is from the southwest. Average wind speed is highest in January at 13 miles per hour from the southwest (USSCS, 1980).

### **2.6.2 Flood Plain and Surface Water**

According to ODNR, no identified 100-year flood plain exists within the corporate limits of North Kingsville, Ohio; therefore, the Premix facility is not located within a 100-year flood plain (PRC, 1992b). The closest body of surface water is an on-site pond, approximately 5 acres in size. The facility is about 1 mile south of Lake Erie and 1.5 miles north of Conneaut Creek. Seasonal, forested and emergent, Palustrine wetlands exist within 0.5 mile of the facility to the south and southeast (USDI, 1977).

### **2.6.3 Geology and Soils**

Soil borings drilled at the facility in 1979 indicate that crushed limestone exists from 0 to 0.5 feet below ground surface (bgs). Brown coarse to fine sand, with some silt and gravel, was encountered from 0.5 to 18 feet bgs; brown medium and fine sand, with trace amounts of silt, was encountered from 18 to 23 feet bgs; gray medium and coarse sand, with traces of gray silty clay, was encountered from 23 to 28 feet bgs; and gray silty clay, with some layers of gray silty fine sand, was encountered from 28 to 31 feet bgs, where the boring ended (Herron, 1979).

Regional geology indicates that glacial till extends to 120 feet bgs. Bedrock of the Ohio Shale formation is first encountered at a depth of 120 feet bgs and extends to approximately 620 feet bgs (PRC, 1992a).

### **2.6.4 Ground Water**

According to the 1979 soil borings drilled at the facility, ground water is encountered below the facility at about 15 to 18 feet bgs (Herron, 1979). Most ground water is found in the glacial till; very little ground water is encountered in the Ohio Shale (PRC, 1992a). Ground water in the area generally flows northward to Lake Erie. Ground water is not used as a municipal

source of drinking water. However, one private well exists 1 mile southeast of the facility. PRC was unable to determine if the well is active. The city of North Kingsville obtains its drinking water from the city of Ashtabula, which gets drinking water from Lake Erie.

## **2.7 RECEPTORS**

The 61-acre Premix facility is located in a rural area near North Kingsville, Ohio, and is bordered on the north by railroad tracks, and on all other sides by sparsely populated land. The facility is secured by 24-hour security guards. Visitors to the facility must check in through a receptionist at the main entrance.

The closest school is located about 1 mile southwest of the facility. Wetlands exist within 0.5 mile to the south and southeast of the facility. No state or national parks or wildlife preserves exist within 2 miles of the facility.

### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the eight SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

<b>SWMU 1</b>	<b>Former Hazardous Waste Storage Area</b>
<b>Unit Description:</b>	This unit consisted of an outdoor gravel area, about 15 by 30 feet, located on the east side of the west leg of the facility building (see Photograph No. 1).
<b>Date of Startup:</b>	This unit began storing waste in November 1980.
<b>Date of Closure:</b>	This unit ceased storing waste in July 1982. OEPA approved closure for this unit in August 1989.
<b>Wastes Managed:</b>	This unit managed most wastes produced at the facility, including: waste flammable resin (D001); waste solvent ES-2173C (D001); waste pyridine (D001 and F003); waste mixed solvents (D001, F002, F003, and F005); waste solvent ES-265E (D001); waste solvent SP-731 (D001); waste paint and thinner (D001 and D035); and waste stoddard solvent (D001).
<b>Release Controls:</b>	This unit had no release controls.
<b>History of Documented Releases:</b>	No releases from this unit have been documented.
<b>Observations:</b>	During the VSI, PRC observed miscellaneous pieces of equipment in this unit. The area is still covered with gravel. PRC observed no hazardous wastes or evidence of spills in this area.



**SWMU 2****Former Hazardous Waste Storage Pad**

**Unit Description:** This unit consisted of a partially bermed, 910-square-foot concrete pad located in the center of the facility complex (see Photograph No. 2). Some of this unit has now been built upon.

**Date of Startup:** This unit began storing waste in August 1982.

**Date of Closure:** This unit ceased storing waste in July 1989. OEPA approved closure for this unit in August 1989.

**Wastes Managed:** This unit managed most wastes produced at the facility, including: waste flammable resin (D001); waste solvent ES-2173C (D001); waste pyridine (D001 and F003); waste mixed solvents (D001, F002, F003, and F005); waste solvent ES-265E (D001); waste solvent SP-731 (D001); waste paint and thinner (D001 and D035); and waste stoddard solvent (D001).

**Release Controls:** This unit was partially bermed and on a concrete pad.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** During the VSI, PRC observed that part of the concrete pad had been built on and the other part was paved over. No waste was stored in this area. Because of the building and paved area, PRC was unable to determine if evidence of release existed.

**SWMU 3****Outdoor, Covered Drum Storage Area**

**Unit Description:** This unit consists of a 40- by 60-foot concrete pad with one north-south seam (see Photograph No. 3). The area is bermed on the north side by a 4.5-foot cinderblock wall, on the east side by the facility building wall, on the south side by a 2.5-foot berm, and the west side is unbermed. The western edge of the unit is a 6- by 8-inch grate-covered trench, which ties into a 2- by 3-foot grate-covered trench that runs along the north side of the unit, within the cinderblock wall.

**Date of Startup:** This unit began storing waste in July 1989.

**Date of Closure:** This unit is currently active as a less than 90-day storage area.

**Wastes Managed:** This unit manages most wastes produced at the facility, including: waste flammable resin (D001); waste solvent ES-2173C (D001); waste pyridine (D001 and F003); waste mixed solvents (D001, F002, F003, and F005); waste solvent ES-265E (D001); waste solvent SP-731 (D001); waste paint and thinner (D001 and D035); and waste stoddard solvent (D001).

**Release Controls:** This unit is bermed on three sides (north, south, and east), has two connected containment trenches that run along the north and west sides of the unit, and has a 10-foot deep sump, located at the east end of the north-side trench. The sump has a 6-inch diameter discharge line, via one of the facility's two drains, to the on-site pond. The sump discharge is located 4 inches below the trench grade (PRC, 1992d).

**History of Documented Releases:** In July 1989, a fire broke out in this unit. Overflow from extinguishing the fire drained, via one of the facility's two drains, to the on-site pond. Water samples were collected from the pond; sample results indicated that no contamination was present in the pond. The facility claims that no hazardous contaminants escaped from the unit except for smoke and vapors during the fire.

**Observations:** During the VSI, this unit contained 56 drums of nonhazardous resin waste, 13 drums of flammable liquid, and 2 drums of combustible liquid. PRC noted no cracks or stains on the concrete floor or berm. The sump was clean and dry. Because of the depth of the sump, PRC was unable to determine if the sump wall or floor was cracked.

**SWMU 4****Waste Solvent Accumulation Area**

**Unit Description:** This unit is an unbermed concrete area within the mixing, bulk molding, and sheet molding area of the facility building (see Photograph No. 4).

**Date of Startup:** This unit began storing waste in 1980.

**Date of Closure:** This unit is currently active.

**Wastes Managed:** This unit manages waste solvent ES-2173C (D001) and waste mixed solvents (D001, F002, F003, and F005).

**Release Controls:** This unit is located on a concrete floor within the facility building.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** During the VSI, PRC observed two drums of waste solvent in this unit. The drums were stored open with funnels in the bung openings.

**SWMU 5****Waste Organic Peroxide Storage Area**

**Unit Description:** This unit is a 5- by 9-foot concrete block building located north of the east leg of the facility building. No photograph is available because, during the VSI, facility representatives did not indicate that this building stored hazardous waste.

**Date of Startup:** This unit began storing waste in 1975.

**Date of Closure:** This unit is currently active.

**Wastes Managed:** This unit manages waste organic peroxide (D003).

**Release Controls:** This unit is a concrete building with no floor drains (PRC, 1992c).

<b>History of Documented Releases:</b>	No releases from this unit have been documented.
<b>Observations:</b>	PRC observed the outside of this unit. The integrity of the building was sound.
<b>SWMU 6</b>	<b>Waste Paint Accumulation Area</b>
<b>Unit Description:</b>	This unit is an unbermed concrete area, located in the paint area within the facility building (see Photograph No. 5).
<b>Date of Startup:</b>	This unit began storing waste in 1977.
<b>Date of Closure:</b>	This unit is currently active.
<b>Wastes Managed:</b>	This unit manages waste paint and thinner (D001 and D035).
<b>Release Controls:</b>	This unit is located on a concrete floor within the facility building.
<b>History of Documented Releases:</b>	No releases from this unit have been documented.
<b>Observations:</b>	During the VSI, PRC observed one drum of solvent waste and one drum of paint related waste in this unit. These drums were stored open, with funnels in the bung openings. PRC observed paint stains, but no cracks, on the concrete floor.
<b>SWMU 7</b>	<b>Dust Collectors</b>
<b>Unit Description:</b>	This unit consists of three bag house-type dust collectors. The dust collectors are located on the east side of the west leg of the facility building and in the central area of the complex (see Photograph No. 2).
<b>Date of Startup:</b>	The two dust collectors located on the east side of the west leg of the building began operating in 1980. The other dust collector began operating in 1972.

Date of Closure: This unit is currently active.

Wastes Managed: This unit manages nonhazardous waste glass dust from sanding and grinding operations.

Release Controls: This unit is a release control for exhaust from sanding and grinding operations.

History of Documented Releases: No releases from this unit have been documented.

Observations: PRC observed that the unit is properly managed. No glass dust was observed on the ground surrounding the area.

**SWMU 8**

**Waste Hydraulic Oil and Stoddard Solvent Storage Area**

Unit Description: This unit is an unbermed concrete area within the facility building (see Photographs No. 6 and 7).

Date of Startup: This unit began storing waste in 1984.

Date of Closure: This unit is currently active.

Wastes Managed: This unit manages nonhazardous waste hydraulic oil and waste stoddard solvent (D001).

Release Controls: This unit is located on a concrete floor within the facility building.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, PRC observed three drums of stoddard solvent, and one full tote of waste hydraulic oil in this area. PRC observed oil stains, but no cracks, on the concrete floor.

#### 4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. This AOC is discussed below. Its location is shown in Figure 2.

##### AOC 1      On-site Pond

Premix maintains a 5-acre On-site Pond (AOC 1) into which it discharges treated sanitary waste, noncontact cooling water, and storm run-off (see Photograph No. 8). The pond, built in 1964, is unlined and may seep into local ground water. Floor drains exist within the facility building only in areas where molding compounds have already been mixed, making the compounds nonhazardous. The purpose of the floor drains is to drain sprinkler water, in the event of a fire, to the pond. The potential for a hazardous release to a floor drain within the facility building with subsequent discharge to the pond is low.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified eight SWMUs and one AOC at the Premix facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOC at the facility and the recommended further actions.

### **SWMU 1                      Former Hazardous Waste Storage Area**

**Conclusions:**                      No releases from this unit have been documented. This unit is no longer active and was RCRA-closed in 1989. Therefore, the potential for release of hazardous constituents from this unit to environmental media is low.

**Recommendations:**            PRC recommends no further action for this unit.

### **SWMU 2                      Former Hazardous Waste Storage Pad**

**Conclusions:**                      No releases from this unit have been documented. This unit is no longer active and was RCRA-closed in 1989. Therefore, the potential for release of hazardous constituents from this unit to environmental media is low.

**Recommendations:**            PRC recommends no further action for this unit.

### **SWMU 3                      Outdoor, Covered Drum Storage Area**

**Conclusions:**                      This unit has adequate secondary containment and is in good condition. Therefore, the potential for release of hazardous constituents from this unit to environmental media is low.

**Recommendations:**            PRC recommends no further action for this unit.

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**SWMU 4**

**Waste Solvent Accumulation Area**

**Conclusions:** No releases from this unit have been documented. This unit is located on a concrete floor within the facility building. Therefore, the potential for release of hazardous constituents from this unit to environmental media is low.

**Recommendations:** PRC recommends that all drums in this unit be stored closed.

**SWMU 5**

**Waste Organic Peroxide Storage Area**

**Conclusions:** No releases from this unit have been documented. This unit is a concrete building with no floor drains. Therefore, the potential for release of hazardous constituents from this unit to environmental media is low.

**Recommendations:** PRC recommends no further action for this unit.

**SWMU 6**

**Waste Paint Accumulation Area**

**Conclusions:** No releases from this unit have been documented. This unit is located on a concrete floor within the facility building. Therefore, the potential for release of hazardous constituents from this unit to environmental media is low.

**Recommendations:** PRC recommends that all drums in this unit be stored closed.

**SWMU 7**

**Dust Collectors**

**Conclusions:** No releases from this unit have been documented. This unit does not handle hazardous waste or constituents. Therefore, the potential for release of hazardous constituents from this unit to environmental media is low.

**Recommendations:** PRC recommends no further action for this unit.

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**SWMU 8**

**Waste Hydraulic Oil and Stoddard Solvent Storage Area**

**Conclusions:** No releases from this unit have been documented. This unit is located on a concrete floor within the facility building. Therefore, the potential for release of hazardous constituents from this unit to environmental media is low.

**Recommendations:** PRC recommends no further action for this unit.

**AOC 1**

**On-site Pond**

**Conclusions:** This AOC is an unlined pond that receives treated sanitary waste, noncontact cooling water, and storm run-off. The potential for hazardous constituents to be discharged via floor drains from the facility to the pond is low.

**Recommendations:** PRC recommends that a means of containing floor drain discharge before it enters the pond be installed.

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**TABLE 3**  
**SWMU AND AOC SUMMARY**

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former Hazardous Waste Storage Area	1980 to 1982	None	No further action
2. Former Hazardous Waste Storage Pad	1982 to 1989	None	No further action
3. Outdoor, Covered Drum Storage Area	1989 to present	None	No further action
4. Waste Solvent Accumulation Area	1980 to present	None	Store drums closed
5. Waste Organic Peroxide Storage Area	1975 to present	None	No further action
6. Waste Paint Accumulation Area	1977 to present	None	Store drums closed
7. Dust Collectors	1972 and 1980 to present	None	No further action
8. Waste Hydraulic Oil and Stoddard Solvent Storage Area	1984 to present	None	No further action
<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. On-site Pond	1964 to present	None	Contain floor drain discharge before it enters the pond

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**ATTACHMENT A**  
**EPA PRELIMINARY ASSESSMENT FORM 2070-12**



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE OH 02 SITE NUMBER  
OHD 004 200 044

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Premix, Inc.	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER Harmon Road and Route 20				
03 CITY North Kingsville	04 STATE OH	05 ZIP CODE 44068	06 COUNTY Ashtabula	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 41° 55' 20". N		LONGITUDE 80° 39' 30". W			
10 DIRECTIONS TO SITE (Starting from nearest public road) From I-90 take Hwy. 193 north to U.S. Route 20, go east on Route 20 for 2 to 3 miles, facility is on the north side of Route 20					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Premix, Inc.	02 STREET (Business, mailing, residential) P.O. Box 281				
03 CITY North Kingsville	04 STATE OH	05 ZIP CODE 44068	06 TELEPHONE NUMBER (216) 224-2181		
07 OPERATOR (if known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ( )		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 08/13/80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ <input type="checkbox"/> C. NONE MONTH DAY YEAR    MONTH DAY YEAR					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 06 / 25 / 92 <input type="checkbox"/> NO BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): PRC Environmental Management, Inc.		02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1964   Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN	
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Flammable resins, flammable solvents, organic peroxide, paint and thinner					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION None					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input checked="" type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448		
04 PERSON RESPONSIBLE FOR ASSESSMENT Jean Michaels	05 AGENCY	06 ORGANIZATION PRC	07 TELEPHONE NUMBER (312) 856-8703	08 DATE 08/21/92 MONTH DAY YEAR	



**ATTACHMENT B**  
**VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS**

## VISUAL SITE INSPECTION SUMMARY

Premix, Inc. (Premix)  
P.O. Box 281  
North Kingsville, Ohio 44068  
OHD 004 200 044

Date: June 25, 1992

Primary Facility Representative: Raymond Kovacs, Environmental Manager  
Representative Telephone No.: 216/224-2181  
Additional Facility Representatives: Ed Trenn, Assistant Environmental Manager  
216/224-2181

Inspection Team: Jean Michaels, PRC Environmental Management, Inc.  
(PRC)  
Manoj Mishra, PRC

Photographer: Manoj Mishra, PRC

Weather Conditions: Sunny, 75°F

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 10:30 a.m. The inspection team observed the molding compound mixing area; bulk and sheet molding areas; press area; finishing area; paint area; and all solid waste management units (SWMU). PRC photographed all SWMUs except SWMU No. 5.

The tour concluded at 12:30 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 1:00 p.m.





**Photograph No. 1**  
**Orientation:** Southwest  
**Description:** Former Hazardous Waste Storage Area

**Location:** SWMU 1  
**Date:** June 25, 1992



**Photograph No. 2**  
**Orientation:** South  
**Description:** Former Hazardous Waste Storage Pad and Dust Collectors

**Location:** SWMU 2 and 7  
**Date:** June 25, 1992



**Photograph No. 3**  
**Orientation:** Southeast  
**Description:** Outdoor, Covered Drum Storage Area

**Location:** SWMU 3  
**Date:** June 25, 1992



**Photograph No. 4**  
**Orientation:** Southwest  
**Description:** Solvent distribution and Waste Solvent Accumulation Area--two waste drums stored open with funnels in bung openings

**Location:** SWMU 4  
**Date:** June 25, 1992





Photograph No. 5

Orientation: East

Description: Waste Paint Accumulation Area--two drums stored open with funnels in bung openings

Location: SWMU 6

Date: June 25, 1992



Photograph No. 6

Orientation: East

Description: Waste Hydraulic Oil and Stoddard Solvent Storage Area--stoddard solvent in drums

Location: SWMU 8

Date: June 25, 1992



Photograph No. 7  
 Orientation: West  
 Description: 500-gallon tote for waste hydraulic oil

Location: SWMU 8  
 Date: June 25, 1992



Photograph No. 8  
 Orientation: South  
 Description: On-site Pond

Location: AOC 1  
 Date: June 25, 1992

**ATTACHMENT C**  
**VISUAL SITE INSPECTION FIELD NOTES**

(74)

6/25 Permixon, Inc.

9:00 AM

Permixon started opp in N Kingsville  
many of compounds for own  
use & small parts for outside  
use

Ops have grown over years  
1/2 of what make is for sale  
1/2 for own molding use

Nonhaz:

Scrap parts - plastic fiberglass  
molded thru compression

Compound - mixture of resin, catalyst,  
filler, glass (sheet & bulk form)  
off spec, customers returned mat'l  
intrafic: heats molds - recycled off site

Ultra-spec - / Cleveland - recycle  
Chem. Solv. SA - disposes unrecycl. 6/15/82

(75)

Haz -  
(D001) Waste Flamm. Liquid: Remed  
→ Offsite - MC. Syspec, Inc. Indiana  
Chemical Solvents, Inc. / Cleveland  
(6-15 dr/wk)

Chemical Solv. - sort of like S-K.

(D001, F002, F003, P005) RA, Methanol, TCE,  
Acetone, CFC-113: use since  
phased out  $\text{CH}_2\text{Cl}_2$ . In process of  
phasing this out too. (2-3 dr/2 wks)  
tool room paint, molding, finishing  
(5-12/wk)

- (1) New solv. (D001) - ethers - acetate base
- (2) SP-34 xyleneacetone for quick change operations (2-4 dr/wk) (1 dr/wk)
- (3) SP-87 - no longer used - incamp lab (64)  
ES2173C - new use (higher flash)  
determine glass content (1 dr/wk)



(76)

<sup>rough + resin</sup>

Waste pyridine: DOO1, DOO3

from QA lab - determines H<sub>2</sub>O content (lb/1000)

paint waste (DOO1, DOO5): (lb/54 wks)

parts painting / paint booth

stacked (DOO1): maintenance

degreasing - reclaimed (CS)

100 / 100 - 2 mo

SP-70 (DOO1): from solvent bonding 100 / 4 mo

paint filters - non haz 30<sup>#</sup> / wk

Dust collector: <sup>glass</sup> 200<sup>#</sup> / mo. sanding, cutting

Raw Mat'l's polyester resins, fillers, catalysts,

Molded parts / over all Compd Div.

Molded compd form sheets & bulk compds

QAM 6/25/92

(77)

Molded part: presses

injection, compression, transfer

- some packaged & shipped

- other parts require finishing

Finishing repairs - grinding, building, solvent bonding, machining, paint prep.

Paint: dry booth, bake oven,

Wash: water wash - particulate

and solvent removal / remove

electrostatic charges

used to be solvent wash (5-8 yrs ago)

Final Insp. / Packaging

QAM 6/25/92

(70)

Scrap parts - compactor system  
to trash

Working on ideas to grind up and  
recycle or reuse in other application

Acres: 61

Sq ft: 280K

Employees: 535 / Corp. HQ

NPDES: storm to pond

WWTS: treats sanitary wastes to  
pond

MF empd - no drains -

Pond is in lowpt. - all drainage  
from fac. goes to pond - pond  
does not discharge to other water.

gfm 4/25/80

(79)

Pond stocked w/ fish & frogs

N: residence / Conrail RR  
residences / munic.  
Conrail RR

S: residences

W: residences

City Water - Ashtabula  
from lake Erie

Security: 7-day 24-hour guard;  
outside guard for nonops times,  
check-in through recep.

3 shifts / 24 hrs operation 6-7 days

Air permits: <sup>paint</sup> spray booths; other areas  
permitted by area - bulk molding, compdng.

gfm 6/15/82



(18)

No spills

Geology: Rt. 20 <sup>old</sup> beach/sandy  
faunaled-gravel

→ No USTs

Scrap metal - minimal - al, Cu

0:30 tour

Noble organic provide - inc. <sup>(0003)</sup> 1dr/2mo.  
off-spec; residualants; OAH  
Cmpd area

Pond - Same

Photo 1: South pond: bwr

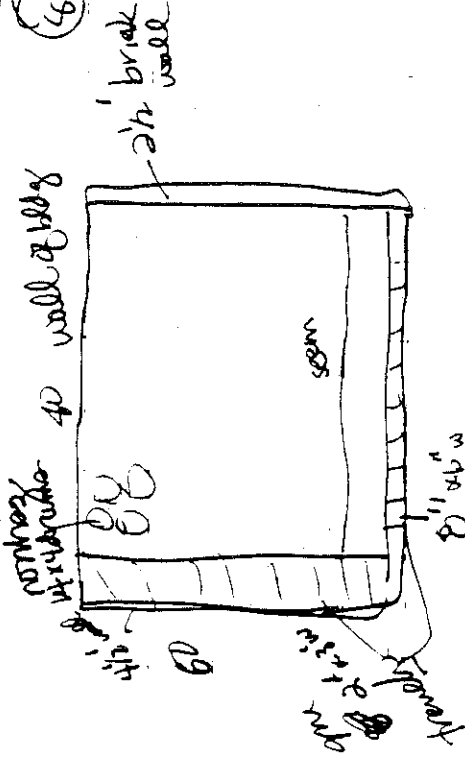
Former HUSA (1980-1986) gravel area

solid polymer 2W photo

Current HUSA: SE photo 13

AM 6/26/62

(61)



2 comb. lig. wastes on pallets

B Flam lig.

concrete floor 1 seen

no cracks, no stains, roof

Photo 4: Temp. lig. Storage W-SW

2-dr of waste solvent

uncovered funnels in dr

Photo 5: Former HWSF 1985 1987

Photo 6: E point storage <sup>started</sup> 1977

1dr SP Dr waste

1dr paint id. waste <sup>Egpm</sup>

Photo 7: Dr. manx. oil/stall and accum.

Photo 8 - W - waste oil foto 1 1/2 full

AM 6/25/62

(42)

12:30 - end of tour

— 1991 Annual Report

still bottoms — not from distillation  
unit — tank bottoms from tub  
washing and drum washing

- Soil borings
- water analysis from five
- Don't have "Final" letter — 8/8/89
- at Report — indicate no response from EPA  
on closure
- copy of updated blowup map

→ Free-col Laboratories, Inc. / Meadville, PA  
4 samples < .002 mg/l Styrene

100 left facility

APR 16/89

com 6/15/92

(43)

VF

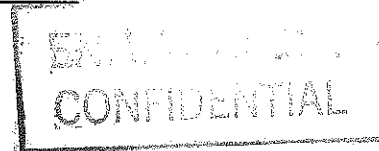
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## CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Rick Herseemann  
Date: September 9, 1992

### Background Facility Information

Facility Name: Premix, Inc.  
EPA Identification No.: OHD 004 200 044  
Location (City, State): North Kingsville, OH  
Facility Priority Rank: Low



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WIND RECORDING

OCT 18 1992

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

The entire facility, which includes 8 SWMUs and 1 AOC

### Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

- ☐ No corrective action activities initiated (Go to 5)  
☒ RCRA Facility Assessment (RFA) or equivalent completed  
☐ RCRA Facility Investigation (RFI) underway  
☐ RFI completed  
☐ Corrective Measures Study (CMS) completed  
☐ Corrective Measures Implementation (CMI) begun or completed  
☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit  
☐ Post-closure permit  
☐ Enforcement order  
☒ Other (Explain)

No corrective action activities have been initiated.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes  
☐ No  
☐ Uncertain; still underway  
☒ Not required

Additional explanatory notes:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

RELEASED  
DATE 8/15/01  
RIN # WV  
INITIALS WV

Premix, Inc. - OHD 004 200 044

**Facility Releases and Exposure Concerns**

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

- ☐ Ground water
- ☒ Surface water
- ☐ Air
- ☐ Soils

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

- ☒ No
- ☐ Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 8a)
- ☒ No
- ☐ Uncertain

Additional explanatory notes:

Facility access is restricted.

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
- ☐ No
- ☒ Uncertain

Additional explanatory notes:

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 9)
- ☐ No
- ☒ Uncertain

Additional explanatory notes:

Potential exists for spills to be discharged into the On-Site Pond (AOC 1).

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

- ☒ Yes
- ☐ No
- ☐ Uncertain

Additional explanatory notes:

Potential exists for spills to be discharged into the On-Site Pond (AOC 1).

### Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

No final corrective measures have been identified or planned.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

☒ Yes  
☐ No  
☐ Uncertain

Additional explanatory notes:

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

### Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

☒ Solid  
☐ Light non-aqueous phase liquids (LNAPLs)  
☐ Dense non-aqueous phase liquids (DNAPLs)  
☐ Dissolved in ground water or surface water  
☐ Gaseous  
☐ Other \_\_\_\_\_

13. Which of the following major chemical groupings are of concern at the facility?

☒ Volatile organic compounds (VOCs) and/or semi-volatiles  
☐ Polynuclear aromatics (PAHs)  
☐ Pesticides  
☐ Polychlorinated biphenyls (PCBs) and/or dioxins  
☐ Other organics  
☐ Inorganics and metals  
☐ Explosives  
☐ Other \_\_\_\_\_

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

(X) Yes; Indicate possible course of action.

Floor drains in facility should be capped to prevent spill discharges into the On-Site Pond (AOC 1).

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- ( ) No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

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15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes  
(X) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

(X) Yes  
( ) No

#### Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

(X) Yes  
( ) No  
( ) Uncertain

Additional explanatory notes:

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17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

(X) Yes  
( ) No  
( ) Uncertain

Additional explanatory notes:

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18. Is this facility an appropriate candidate for stabilization activities?

- Explain final decision, using additional sheets if necessary.**

[illegible]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

June 10, 1992

Mr. Raymond Kovacs  
Premix, Inc.  
P.O. Box 281  
North Kingsville, OH 44068

Re: Visual Site Inspection  
Premix, Inc.  
North Kingsville, OH  
OHD 004 200 044

Dear Mr. Kovacs:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for June 25, 1992. The inspection team will consist of Jean Michaels and Manoj Mishra of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

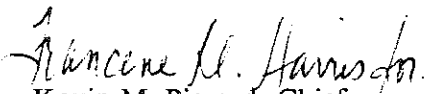


June 10, 1992  
Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Kevin M. Pierard".

Kevin M. Pierard, Chief  
OH/MN Technical Enforcement Section

Enclosure

cc: Ed Lim, OEPA  
Dave Wertz, OEPA

## ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU

Closed TSD

CERTIFICATION REGARDING POTENTIAL RELEASES FROM  
SOLID WASTE MANAGEMENT UNITS

Q

FACILITY NAME: PREMIX INC  
EPA I.D. NUMBER: OH D 0042 000 44  
LOCATION CITY: N. KINGSVILLE  
STATE: OHIO

RECEIVED  
U.S. EPA REGION V  
OFFICE OF THE ATTORNEY GENERAL  
FEB 11 1986

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	_____	<u>X</u>
• Surface Impoundment	_____	<u>X</u>
• Land Farm	_____	<u>X</u>
• Waste Pile	_____	<u>X</u>
• Incinerator	_____	<u>X</u>
• Storage Tank (Above Ground)	_____	<u>X</u>
• Storage Tank (Underground)	_____	<u>X</u>
• Container Storage Area	_____	<u>X</u>
• Injection Wells	_____	<u>X</u>
• Wastewater Treatment Units	_____	<u>X</u>
• Transfer Stations	_____	<u>X</u>
• Waste Recycling Operations	_____	<u>X</u>
• Waste Treatment, Detoxification	_____	<u>X</u>
• Other _____	_____	<u>X</u>

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FEB 18 1986

U.S. EPA REGION 5  
OFFICE OF REGIONAL  
ADMINISTRATION

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

O. WMD  
CC: RF(CERT-ROUTINE)

FEB 19 1986

RECEIVED

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE

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4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NONE

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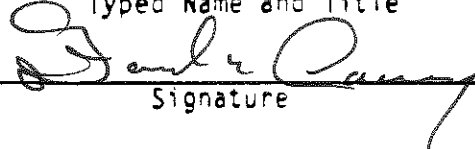
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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Ford M. Davey Corporate Senior Vice President

Typed Name and Title

  
Signature

2/19/86  
Date

**F.1 Imagery/Special  
Studies**